

Claire Tonry
SMITH & LOWNEY, PLLC
2317 East John Street
Seattle, Washington 98112
(206) 860-2883

Simone Anter
Columbia Riverkeeper
407 Portway Avenue, Suite 301
Hood River, Oregon 97031
(541) 399-5312

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

COLUMBIA RIVERKEEPER,)
v. Plaintiff,)) COMPLAINT
MERCURY PLASTICS, INC.,)
Defendant.)

)

I. INTRODUCTION

1. This action is a citizen suit brought under Section 505 of the Clean Water Act (“CWA”) as amended, 33 U.S.C. § 1365. Plaintiff Columbia Riverkeeper seeks a declaratory judgment, injunctive relief, the imposition of civil penalties, and the award of costs, including attorneys’ and expert witnesses’ fees, for Defendant Mercury Plastics, Inc.’s repeated and ongoing violations of Sections 301(a) and 402 of the CWA, 33 U.S.C. §§ 1311(a) and 1342, and the terms and conditions of its National Pollutant Discharge Elimination System (“NPDES”)

COMPLAINT - 1

SMITH & LOWNEY PLLC
2317 EAST JOHN STREET
SEATTLE, WASHINGTON 98112
(206) 860-2883

1 permit authorizing discharges of pollutants from Defendant's Vancouver, Washington, facility to
2 navigable waters.

3 **II. JURISDICTION AND VENUE**

4 2. The Court has subject matter jurisdiction under Section 505(a) of the CWA, 33
5 U.S.C. § 1365(a). The relief requested herein is authorized by 33 U.S.C. §§ 1319(d) and
6 1365(a).

7 3. Under Section 505 (b)(1)(A) of the CWA, 33 U.S.C. § 1365(b)(1)(A), Plaintiff
8 notified Defendant of Defendant's violations of the CWA and of Plaintiff's intent to sue under
9 the CWA by letter dated and postmarked August 13, 2021 and delivered August 16, 2021
10 ("Notice Letter"). A copy of the Notice Letter is attached to this complaint as Exhibit 1. The
11 allegations in the Notice Letter are incorporated herein by this reference. Plaintiff notified
12 Defendant's Registered Agent, the Administrator of the United States Environmental Protection
13 Agency ("USEPA"), the Administrator of USEPA Region 10, and the Director of the
14 Washington Department of Ecology ("WDOE") of its intent to sue Defendant by mailing copies
15 of the Notice Letter to these officials on August 13, 2021.

16 4. More than sixty days have passed since the Notice Letter was served and the
17 violations complained of in the Notice Letter are continuing or are reasonably likely to continue
18 to occur. Defendant is in violation of its NPDES permit and the CWA. Neither the USEPA nor
19 the WDOE has commenced any action constituting diligent prosecution to redress these
20 violations.

21 5. The source of the violations complained of is located in Clark County,
22 Washington, within the Western District of Washington, and venue is therefore appropriate in
23

1 the Western District of Washington pursuant to Section 505(c)(1) of the CWA, 33 U.S.C. §
 2 1365(c)(1).

3 **III. PARTIES**

4 6. Plaintiff, Columbia Riverkeeper, is suing on behalf of itself and its members.
 5 Columbia Riverkeeper is a 501(c) non-profit corporation organized under the laws of the State of
 6 Washington. The mission of Columbia Riverkeeper is to restore and protect the water quality of
 7 the Columbia River and all life connected to it, from the headwaters to the Pacific Ocean. To
 8 achieve these objectives, Columbia Riverkeeper implements scientific, educational, and legal
 9 programs aimed at protecting water quality and the habitat in the Columbia River Basin. This
 10 lawsuit is part of Columbia Riverkeeper's effort to improve water quality in the Columbia River
 11 Basin for purposes including recreation, habitat quality, and subsistence, recreational, and
 12 commercial fishing.

13 7. Plaintiff has representational standing to bring this action. Columbia Riverkeeper
 14 has over 16,000 members, many of whom reside in the vicinity of waters affected by
 15 Defendant's discharges of pollutants. Members of Columbia Riverkeeper use and enjoy the
 16 waters and surrounding areas that are adversely affected by Defendant's discharges. Columbia
 17 Riverkeeper's members use these areas for, *inter alia*, fishing, swimming, hiking, walking,
 18 photography, boating, and observing wildlife. Columbia Riverkeeper's members have serious
 19 concerns about the impacts of Defendant's operations and polluted industrial stormwater
 20 discharges on the Columbia River. The environmental, health, aesthetic, and recreational
 21 interests of Columbia Riverkeeper's members have been, are being, and will be adversely
 22 affected by Defendant's NPDES permit violations addressed herein and by the members'
 23 reasonable concerns related to the effects of the violations and pollutant discharges. In addition,
 24

25
 26
 27
 28
 29 COMPLAINT - 3

SMITH & LOWNEY PLLC
 2317 EAST JOHN STREET
 SEATTLE, WASHINGTON 98112
 (206) 860-2883

1 discharges from Defendant's facility lessen Columbia Riverkeeper's members' aesthetic
2 enjoyment of nearby areas. Columbia Riverkeeper's members' concerns about the effects of
3 Defendant's discharges are aggravated by Defendant's failure to record and report information
4 about its discharges and pollution controls. These injuries are fairly traceable to the Defendant's
5 violations of the CWA and are redressable by the Court.
6

7 8. Plaintiff has organizational standing to bring this action. Plaintiff actively
8 engages in a variety of educational and advocacy efforts to improve water quality and to address
9 sources of water quality degradation in the Columbia River and its tributaries. Defendant has
10 failed to fulfill monitoring, recordkeeping, reporting, public disclosure, and planning
11 requirements, among others, necessary for compliance with its NPDES permit and the CWA. As
12 a result, Plaintiff is deprived of information that supports its ability to advance its mission and
13 serve its members by disseminating information and taking appropriate action. Plaintiff's efforts
14 to educate and advocate for greater environmental protection for the benefit of its members is
15 thereby obstructed. Finally, Plaintiff and the public are deprived of information that influences
16 members of the public to become members of Columbia Riverkeeper, thereby reducing
17 Columbia Riverkeeper's membership numbers. Thus, Plaintiff's organizational interests have
18 been adversely affected by Defendant's violations. These injuries are fairly traceable to
19 Defendant's violations and are redressable by the Court.
20
21

22 9. Defendant is a corporation authorized to do business in Washington.

23 10. Defendant operates a thermoforming, plastics fabrication, and printing facility,
24 located at or about 3807 SE Hidden Way, Vancouver, Washington, 98661, including contiguous
25 or adjacent properties owned or operated by Defendant (the "facility").
26
27

IV. LEGAL BACKGROUND

11. Section 301(a) of the CWA, 33 U.S.C. § 1311(a), prohibits the discharge of pollutants by any person, unless in compliance with the provisions of the CWA. Section 301(a) prohibits, *inter alia*, such discharges not authorized by, or in violation of, the terms of a NPDES permit issued pursuant to Section 402 of the CWA, 33 U.S.C. § 1342.

12. The State of Washington has established a federally approved state NPDES program administered by the WDOE. WASH. REV. CODE § 90.48.260; WASH. ADMIN. CODE Ch. 173-220. This program was approved by the Administrator of the USEPA pursuant to 33 U.S.C. § 1342(b).

13. Pursuant to Section 402(a) of the CWA, 33 U.S.C. § 1342(a), the WDOE has repeatedly issued the Industrial Stormwater General Permit (“ISGP” or “General Permit”), most recently on November 20, 2019, effective January 1, 2020, and set to expire on December 3, 2024 (the “2020 Permit”). The previous iteration of the permit was issued December 3, 2014, became effective January 2, 2015, and expired December 31, 2019 (the “2015 Permit”). The 2015 Permit and 2020 Permit (collectively, “the Permits”), contain substantially similar requirements and authorize those that obtain coverage under the General Permit to discharge stormwater, a pollutant under the CWA, and other pollutants contained in the stormwater to the waters of the State subject to certain terms and conditions.

14. The Permits impose certain terms and conditions on those covered thereby, including monitoring and sampling of discharges, reporting and recordkeeping requirements. To reduce and eliminate pollutant concentrations in stormwater discharges, the Permits require, among other things, that permittees develop and implement best management practices (“BMPs”) and a Stormwater Pollution Prevention Plan (“SWPPP”), and apply all known and

reasonable methods of prevention, control and treatment (“AKART”) to discharges. When a permittee’s stormwater discharge exceeds benchmark values for concentrations of certain pollutants the Permits require the permittee to complete the applicable Level 1, 2, or 3 corrective action requirements. The specific terms and conditions of the General Permit are described in detail in the Notice Letter, attached hereto as Exhibit 1, and incorporated herein by this reference.

V. FACTS

15. Pursuant to Condition S2 of the Permits, WDOE granted the Defendant General Permit coverage for the facility under Permit Number WAR003984.

16. Defendant's facility is engaged in industrial activity and discharges stormwater and other pollutants to the Columbia River via pipes, drains, and other discrete stormwater conveyances.

17. Discharges from Defendant's facility contribute to the polluted conditions of the waters of the State, including to the impairment of the Columbia River for temperature, dissolved oxygen, turbidity, copper, zinc and aesthetic values, which has resulted in the inclusion of the Columbia River on the 303(d) list of impaired waters. Discharges from Defendant's facility contribute to the ecological impacts that result from the polluted state of these waters and to Plaintiff's and their members' injuries resulting therefrom.

18. The vicinity of the facility and the receiving waters are used by the citizens of Washington and visitors, as well as at least one of Plaintiff's members, for recreational activities, including boating, biking, fishing and nature watching. Plaintiff's member(s) also derive(s) aesthetic benefits from the receiving waters. Plaintiff's and its members' enjoyment of these

1 activities and waters is diminished by the polluted state of the receiving waters and by
2 Defendant's contributions to such polluted state.

3 19. Defendant has violated the Permits and Sections 301(a) and 402 of the CWA, 33
4 U.S.C. §§ 1311(a) and 1342, by discharging pollutants in violation of an NPDES Permit.
5 Defendant's violations of the Permits and the CWA are set forth in full in the Notice Letter,
6 attached hereto as Exhibit 1, and are incorporated herein by this reference. In particular and
7 among the other violations described in the Notice Letter, Defendant has frequently failed to
8 monitor and report the quality of its stormwater discharges; discharged pollution in amounts that
9 cause or contribute to violations of water quality standards; failed to prepare and implement a
10 compliant SWPPP; failed to comply with the Permits' corrective action requirements; and failed
11 to implement best management practices to control stormwater quality as required by the
12 Permits.

13 20. Defendant has discharged stormwater containing levels of pollutants that exceed
14 the benchmark values established in the Permits, as specified in Table 1 below. Defendant's
15 stormwater discharges are causing or contributing to violations of water quality standards and
16 therefore violate the Permits, Condition S10.A. Additionally, Defendant's exceedances of the
17 benchmark values demonstrate that Defendant is failing to apply AKART to its discharges
18 and/or is failing to implement an adequate SWPPP and BMPs. These requirements and
19 violations are described in detail in section II of the Notice Letter, attached hereto as Exhibit 1,
20 and are incorporated herein by this reference.

21 21. Defendant has sampled its stormwater discharges in the calendar quarters
22 identified in Table 1 of this Complaint and determined that such discharges contained pollution
23 in amounts exceeding benchmarks, as shown in Table 1.

Table 1: Mercury Plastics Stormwater Discharges that Exceed Benchmark Values from 1st Quarter 2016 to 2nd Quarter 2021

Quarter in which sample was collected	Turbidity (Benchmark 25 NTU)	Zinc (Benchmark 117 µg/L)	Copper (Benchmark 14 µg/L)
1Q 2016	43		
2Q 2016	66		
1Q 2017	38		
2Q 2017	41.5		30.8
3Q 2017		340	
2Q 2018		200	
4Q 2018	33	132	
1Q 2019	27		
1Q 2020	52	118	
3Q 2020	36	1000	68
4Q 2020	27	190	
2Q 2021	37	140	

22. The stormwater samples identified in Table 1 are representative of and accurately characterize the quality of stormwater discharges generated by the facility during the associated calendar quarter.

23. Defendant has not developed and/or implemented a SWPPP in accordance with the requirements of the Permits, Condition S3. Defendant's SWPPP does not specify all of the BMPs that are necessary to provide AKART and to ensure that discharges do not cause or contribute to violations of water quality standards, does not include a compliant site map, does not include an adequate facility assessment, inventory of industrial activities and inventory of materials in sufficient detail, does not include a compliant stormwater sampling plan and does not satisfy other requirements of the Permits, including certain mandatory BMPs. These SWPPP

1 requirements and violations are described in detail in section III of the Notice Letter, attached
 2 hereto as Exhibit 1, and are incorporated herein by this reference.

3 24. Defendant has violated and continues to violate the monitoring requirements in
 4 the Permits. *See* 2020 Permit Conditions S3.B.5, S4 and S9.B and E; 2015 Permit Conditions
 5 S3.B.5, S4 and S9.A and D. Defendant has failed to collect stormwater samples and/or submit
 6 discharge monitoring reports each quarter during the last five years that it failed to collect
 7 stormwater samples from all distinct points of discharge, including Outfall 3, which includes all
 8 four quarters of 2016, all four quarters of 2017, all four quarters of 2018, all four quarters of
 9 2019, all four quarters of 2020, and to date in 2021.

10 25. Defendant failed to collect stormwater samples and/or to submit a DMR within
 11 the time prescribed for Monitoring Point 1 for the third quarter of 2016, second quarter of 2018,
 12 first quarter of 2020, and for Monitoring Point 003 each and every quarter during the last five
 13 years. These monitoring requirements and violations are described in section IV of the Notice
 14 Letter, attached hereto as Exhibit 1, and are incorporated herein by this reference.

15 26. Defendant has not conducted and/or documented inspections as required by the
 16 Permit Condition S7. These inspection requirements and violations are described in detail in
 17 section IV.C of the Notice Letter, attached hereto as Exhibit 1, and are incorporated herein by
 18 this reference.

19 27. Defendant has not conducted and/or completed the corrective action responses as
 20 required by the Permits. Condition S8.B of the Permits require permittee to undertake a Level 1
 21 corrective action whenever it exceeds a benchmark value identified in Condition S5. A Level 1
 22 corrective action comprises an inspection to investigate the cause of the benchmark exceedance
 23 within 14 days of receipt of the corresponding sample results, review of the SWPPP to ensure
 24

25 29. COMPLAINT - 9

SMITH & LOWNEY PLLC
 2317 EAST JOHN STREET
 SEATTLE, WASHINGTON 98112
 (206) 860-2883

1 permit compliance, revisions to the SWPPP to include additional operational source control
2 BMPs with the goal of achieving the applicable benchmark values in future discharges, including
3 signature and certification of the revised SWPPP, summary of the Level 1 corrective action in
4 the annual report, and full implementation of the revised SWPPP as soon as possible, but no later
5 than the DMR due date for the quarter the benchmark was exceeded. Defendant was required to
6 complete a Level 1 corrective action for every benchmark exceedance identified in Table 1
7 above. Defendant has not completed all of these corrective actions as required. These corrective
8 action requirements and violations are described in section V.A of the Notice Letter, attached
9 hereto as Exhibit 1, and are incorporated herein by this reference.
10

12 28. Condition S8.C of the Permits requires Defendant take specified actions, called
13 Level 2 corrective actions, each time quarterly stormwater sample results exceed any of the
14 benchmark values described in Conditions S5.A and S5.B for any two quarters in a calendar
15 year. a Level 2 corrective action requires that Defendant: (1) review the SWPPP for the facility
16 and ensure that it fully complies with Condition S3 of the Permits and contains the correct BMPs
17 from the applicable Stormwater Management Manual; (2) make appropriate revisions to the
18 SWPPP to include additional structural source control BMPs with the goal of achieving the
19 applicable benchmark values in future discharges and sign and certify the revised SWPPP in
20 accordance with the Permits; and (3) summarize the Level 2 corrective action (planned or taken)
21 in the Annual Report required under Condition S9.B of the Permits. Condition S8.C of the
22 Permits requires that Defendant implement the revised SWPPP as soon as possible, and no later
23 than August 31 of the following year from the quarter the benchmark was exceeded. Defendant
24 triggered and failed to perform Level 2 corrective actions including as follows: for turbidity
25 triggered by its stormwater sampling in calendar year 2016; for turbidity triggered by its
26
27
28

29 COMPLAINT - 10

SMITH & LOWNEY PLLC
2317 EAST JOHN STREET
SEATTLE, WASHINGTON 98112
(206) 860-2883

1 stormwater sampling in calendar year 2017; for zinc triggered by its stormwater sampling in
2 calendar year 2018; and for zinc and turbidity triggered by its stormwater sampling in calendar
3 year 2020.

4 29. Condition S8.D. of the Permits require a permittee to undertake a Level 3
5 corrective action whenever it exceeds a benchmark value for any three quarters during a calendar
6 year. A Level 3 corrective action comprises review of the SWPPP to ensure permit compliance,
7 revision of the SWPPP to include additional treatment BMPs with the goal of achieving the
8 applicable benchmark value in future discharges, including signature and certification of the
9 revised SWPPP in accordance with Condition S3.A.5., submit an engineering report with certain
10 elements to Ecology for review for any treatment BMPs that require a site-specific design or
11 sizing, summary of the Level 3 corrective action (planned or taken) in the annual report, and full
12 implementation of the revised SWPPP by September 30 of the following year, including
13 installation of necessary treatment BMPs. Defendant triggered Level 3 response requirements
14 for turbidity and zinc in 2020. Defendant has not completed all of the corrective actions as
15 required. These corrective action requirements and violations are described in section V.C of the
16 Notice Letter, attached hereto as Exhibit 1, and are incorporated herein by this reference.
17

18 30. Defendant is violating the recordkeeping requirements of the Permits. The
19 recordkeeping requirements are outlined in Condition S9.D of the Permits. The Permits require
20 the retention of the records identified for a minimum of five (5) years. Defendant is in violation
21 of this condition by failing to retain the sampling documentation of Condition S4.B.4, the
22 inspection documentation of S7, equipment calibration records, all BMP maintenance records, all
23 original recordings for continuous sampling instrumentation, copies of all laboratory reports as
24
25
26
27
28

1 described in S3.B.5, all DMRs, or copies of any other reports required by the Permit for the
2 specified five-year period.

3 31. Defendant has failed to provide Columbia Riverkeeper with a copy of (or access
4 to) its SWPPP as requested in section IX of the Notice Letter and as required by Condition S9.F
5 of the Permits.

6 32. A significant penalty should be imposed against Defendant pursuant to the
7 penalty factors set forth in 33 U.S.C. § 1319(d).

8 33. Defendant's violations of the CWA degrade the environment and the water
9 quality of the receiving water bodies.

10 34. Defendant's violations were avoidable had Defendant been diligent in overseeing
11 facility operations and maintenance.

12 35. Defendant has benefited economically as a consequence of its violations and its
13 failure to implement improvements at the facility.

14 **VI. CAUSE OF ACTION**

15 36. The preceding paragraphs and the allegations in sections II through IX of the
16 Notice Letter are incorporated herein.

17 37. Defendant's violations of its NPDES permit described herein and in the Notice
18 Letter constitute violations of "effluent standard(s) or limitation(s)" as defined by section 505, 33
19 U.S.C. § 1365.

20 38. The violations committed by Defendant are ongoing or are reasonably likely to
21 continue to occur. Any and all additional violations of the General Permit and the CWA which
22 occur after those described in Plaintiff's Notice Letter but before a final decision in this action
23 should be considered continuing violations subject to this Complaint.

39. Without the imposition of appropriate civil penalties and the issuance of an injunction, Defendant is likely to continue to violate the General Permit and the CWA to the further injury of the Plaintiff, its member(s) and others.

40. A copy of this Complaint is being served upon the Attorney General of the United States and the Administrator of the USEPA as required by 33 U.S.C. § 1365(c)(3).

VII. RELIEF REQUESTED

Wherefore, Plaintiff respectfully requests that this Court grant the following relief:

A. Issue a declaratory judgment that Defendant has violated and continues to be in violation of the Permits and Sections 301 and 402 of the Clean Water Act, 33 U.S.C. §§ 1311 and 1342;

B. Enjoin Defendant from operating its facility in a manner that results in further violations of the Permits or the Clean Water Act;

C. Order Defendant to immediately implement a SWPPP that complies with the 2020 Permit, and to provide Plaintiff with a copy of this Plan;

D. Order Defendant to allow Plaintiff to participate in the development and implementation of Defendant's SWPPP;

E. Order Defendant to provide Plaintiff, for a period beginning on the date of the Court's Order and running for one year after Defendant achieves compliance with all of the conditions of the Permits, with copies of all reports and other documents which Defendant submits to the USEPA or to the WDOE regarding Defendant's coverage under the General Permit at the time it is submitted to these authorities:

F. Order Defendant to take specific actions to remediate the environmental harm caused by its violations:

G. Grant such other preliminary and/or permanent injunctive relief as Columbia Riverkeeper may from time to time request during the pendency of this case;

H. Order Defendant to pay civil penalties of \$55,800.00 per day of violation for each violation committed by Defendant since November 2, 2015 and \$37,500.00 per day of violation for each violation committed by Defendant before November 2, 2015 pursuant to Sections 309(d) and 505(a) of the CWA, 33 U.S.C. §§ 1319(d) and 1365(a), and 40 C.F.R. § 19;

I. Award Plaintiff their litigation expenses, including reasonable attorneys' and expert witness fees, as authorized by Section 505(d) of the CWA, 33 U.S.C. § 1365(d); and

J. Award such other relief as this Court deems appropriate.

RESPECTFULLY SUBMITTED this 21st day of October, 2021.

SMITH & LOWNEY, PLLC

By: s/Claire Tonry
Claire Tonry, WSBA No. 44497
Attorneys for Plaintiff
2317 E. John St.,
Seattle, WA 98112
Tel: (206) 860-2124
Fax: (206) 860-4187
E-mail: claire@smithandlowney.com

COLUMBIA RIVERKEEPER

By: s/Simone Anter
Simone Anter, WSBA #52716
Attorney for Plaintiff
407 Portway Ave., Suite 301
Hood River, OR 97031
Tel: (541) 399-5312
E-mail: simone@columbiariverkeeper.org

Exhibit 1

SMITH & LOWNEY, P.L.L.C.

2317 EAST JOHN STREET
SEATTLE, WASHINGTON 98112
(206) 860-2883, FAX (206) 860-4187

August 13, 2021

Via Certified Mail - Return Receipt Requested

Managing Agent
Mercury Plastics, Inc.
3807 SE Hidden Way
Vancouver, WA 98661

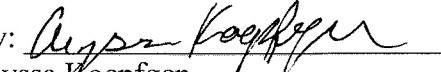
Re: **SUPPLEMENTAL NOTICE OF INTENT TO SUE UNDER THE CLEAN WATER ACT**

Dear Managing Agent:

The August 11, 2021 Notice of Intent to Sue was inadvertently mailed to you without the precipitation data attached. This Supplemental Notice of Intent to Sue is being sent to you to provide you with the precipitation data.

Sincerely,

Smith & Lowney, PLLC

By: 
Alyssa Koepfgen

cc: Michael Regan, Administrator, U.S. EPA
Michelle Pirzadeh, Region 10 Administrator, U.S. EPA
Laura Watson, Director, Washington Department of Ecology
Registered Agent, Mercury Plastics, 3807 SE Hidden Way, Vancouver, WA 98661

SMITH & LOWNEY, P.L.L.C.

2317 EAST JOHN STREET
SEATTLE, WASHINGTON 98112
(206) 860-2883, FAX (206) 860-4187

August 13, 2021

Via CERTIFIED MAIL - Return Receipt Requested

Managing Agent
Mercury Plastics, Inc.
3807 SE Hidden Way
Vancouver, WA 98661

**Re: NOTICE OF INTENT TO SUE UNDER THE CLEAN WATER ACT AND
REQUEST FOR COPY OF STORMWATER POLLUTION PREVENTION PLAN**

Dear Managing Agent:

We represent Columbia Riverkeeper, 407 Portway Ave, Suite 301, Hood River, OR 97031. This letter provides' notice of Columbia Riverkeeper's intent to file a citizen suit against Mercury Plastics, Inc. ("Mercury Plastics") under Section 505 of the Clean Water Act ("CWA"), 33 U.S.C. § 1365, for violations described below. This letter also requests a copy of the complete and current stormwater pollution prevention plan ("SWPPP") required by Mercury Plastic's National Pollution Discharge Elimination System ("NPDES") permit.

Mercury Plastics was granted coverage under Washington's Industrial Stormwater General Permit ("ISGP") issued by the Washington Department of Ecology ("Ecology") which became effective on January 2, 2015, and expired on December 31, 2019 under NPDES Permit WAR003984 (the "2015 Permit"). Ecology granted subsequent coverage under the current iteration of the ISGP, issued by Ecology November 20, 2019, effective January 1, 2020, and set to expire on December 31, 2024 (the "2020 Permit") (collectively with the 2015 Permit, the "Permits") under the same permit number, WAR003984.

Mercury Plastics has violated and continues to violate effluent standard and limitations under the CWA (see 33 U.S.C. § 1365(a) and (f)) including the terms and conditions of the Permits with respect to the operation of, and discharges of stormwater and pollutants from its facility located at or near 3807 SE Hidden Way, Vancouver, Washington 98661 (the "facility"), where it operates a thermoforming, plastic fabrication, and printing services facility. The facility subject to this Notice includes any contiguous or adjacent properties owned by Mercury Plastics.

**I. COLUMBIA RIVERKEEPER'S COMMITMENT TO PROTECTING A
FISHABLE AND SWIMMABLE COLUMBIA RIVER.**

Columbia Riverkeeper's mission is to restore and protect the water quality of the Columbia River basin and all life connected to it, from the headwaters to the Pacific Ocean. Columbia Riverkeeper is a non-profit organization with members who live, recreate, and work through the Columbia River basin, including near and downstream of Mercury Plastics' facility.

Threats facing the Columbia River and its tributaries are severe by any measure. See ENVIRONMENTAL PROTECTION AGENCY, COLUMBIA RIVER BASIN: STATE OF THE RIVER REPORT FOR TOXICS (Jan. 2009), https://www.epa.gov/sites/production/files/documents/columbia_state_of_the_river_report_jan2009.pdf. In fact, the vast majority of rivers and streams in Washington State fail to meet basic state water quality standards for pollutants such as toxins and temperature. *See generally Water Quality Assessment & 303(d) List*, WASHINGTON STATE DEPARTMENT OF ECOLOGY, <https://ecology.wa.gov/Water-Shorelines/Water-quality/Water-improvement/Assessment-of-state-waters-303d> (last visited Feb. 20, 2020) (providing resources on impaired waterbodies in Washington State). Water quality standards are designed to protect designated uses, including aquatic life, fishing, swimming, and drinking water.

Stormwater runoff is “one of the great challenges of water pollution control” and “is a principal contributor to water quality impairment of water bodies nationwide.” NATIONAL RESEARCH COUNCIL, URBAN STORM MANAGEMENT IN THE UNITED STATES vii (Oct. 15, 2008), https://www3.epa.gov/npdes/pubs/nrc_stormwaterreport.pdf. When rain sends runoff across streets, construction projects, and industrial facilities, the water picks up contaminants that are drained into waterways such as the Columbia River and its tributaries. To address this leading cause of water quality impairment, Columbia Riverkeeper invests significant time and resources in reducing pollutant loads from industrial, municipal, and construction stormwater sources.

This Notice of Intent to Sue Mercury Plastics is part of Columbia Riverkeeper’s efforts to improve water quality in the Columbia River Basin for purposes including swimming, habitat quality, and subsistence, recreational, and commercial fishing. Columbia Riverkeeper has serious concerns about the impacts of Mercury Plastics’ operations and industrial stormwater discharges on the Columbia River and its tributaries. As discussed below, Mercury Plastics has habitually failed to properly sample and report its stormwater discharges and failed to adopt and implement an SWPP that satisfies the requirements of Washington State’s ISGP. Mercury Plastics’ operations and stormwater discharges degrade water quality in the Columbia River Basin and may contribute to conditions that place the health of those who use the Columbia River and its tributaries at risk.

II. COMPLIANCE WITH STANDARDS

A. Violations of Water Quality Standards

Condition S10.A of the Permits prohibits discharges that cause or contribute to violations of water quality standards. Water quality standards are the foundation of the CWA and Washington’s efforts to protect clean water. Specifically, water quality standards represent the U.S. Environmental Protection Agency (“the EPA”) and Ecology’s determination, based on scientific studies, of the thresholds at which pollution starts to cause significant adverse effects on fish or other beneficial uses. For each water body in Washington State, Ecology designates the “beneficial uses” that must be protected through the adoption of water quality standards.

A discharger must comply with both narrative and numeric criteria water quality standards WASH. ADMIN. CODE §§ 173-201A-010, -510 (“No waste discharge permit can be

issued that causes or contributes to a violation of water quality criteria, except as provided for in this chapter.”). Narrative water quality standards provide legal mandates that supplement the numeric criteria. Furthermore, the narrative water quality standard applies with equal force even if Ecology has established a numeric water quality standard. Condition S10.A of the Permits requires that Mercury Plastics’ discharges not cause or contribute to an excursion of Washington State water quality standards.

Mercury Plastics directly discharges to the Columbia River, a Critical Large Aquatic Ecosystem. The section of the Columbia to which Mercury Plastics Discharges does not meet water quality standards for temperature or dissolved oxygen and is included on the state’s “303(d) list” of impaired water bodies. Mercury Plastics discharges stormwater that contains elevated levels of copper, zinc, and turbidity, as indicated in the table of benchmarks excursions below. These discharges cause and/or contribute to violations of water quality standards for turbidity, zinc, copper in the Columbia River; and violations of the aquatic life criteria, primary contact criteria, water supply criteria, wildlife habitat criteria, harvesting criteria, commerce and navigation criteria, boating criteria, and aesthetics criteria for the Columbia River. These violations have occurred each and every day during the last five years on which there was 0.1 inch or more of precipitation, and continue to occur. See WASH. ADMIN. CODE §§ 173-201A-200 (fresh water designated uses and criteria), (1)(a)(b) (general criteria that apply to all aquatic life fresh water uses), 1(e) (turbidity criteria), 2(a) (general criteria applicable to fresh water recreational uses), (4) (miscellaneous uses including wildlife habitat, harvesting commerce and navigation, boating, and aesthetics general criteria); § 173-201A-240 (toxic substances criteria for copper and zinc), 173-201A-260 (natural conditions and other water quality criteria and applications), 173-201A-600 (use designations – fresh waters), 173-201A 602 (designated uses for the Columbia River including aquatic life use: spawning/rearing; recreation use: primary contact recreation; water supply uses: domestic, industrial, agricultural, stock, wildlife habitat; and miscellaneous uses: harvesting, commerce and navigation, boating, aesthetics). Precipitation data from that time period is appended to this Notice of Intent to Sue and identifies the days on which there was 0.1 inch or more of precipitation.

Table 1: Benchmark Exceedances- bold values indicate exceedances

Quarter in which sample was collected	Turbidity (Benchmark 25 NTU)	Zinc (Benchmark 117 µg/L)	Copper (Benchmark 14 µg/L)
1Q 2016	43		
2Q 2016	66		
1Q 2017	38		
2Q 2017	41.5		30.8
3Q 2017		340	
2Q 2018		200	
4Q 2018	33	132	
1Q 2019	27		
1Q 2020	52	118	
3Q 2020	36	1000	68
4Q 2020	27	190	
2Q 2021	37	140	

B. Compliance with AKART Standards

Condition S10.C of the Permits requires Mercury Plastics to apply all known and reasonable methods of pollution prevention, control, and treatment (“AKART”) to all discharges, including preparing and implementing an adequate SWPPP and best management practices (“BMPs”). Mercury Plastics has violated and continues to violate this condition by failing to apply AKART to its discharges by, among other things, failing to implement an adequate SWPPP and BMPs. These violations have occurred on each and every day since Ecology issued Mercury Plastics ISGP coverage and continue to occur every day.

Condition S1.A of the Permits requires that all discharges and activities authorized be consistent with the terms and conditions of the Permits. Mercury Plastics has violated these conditions by discharging and acting inconsistent with the conditions of the Permits as described in this Notice of Intent to Sue.

III. STORMWATER POLLUTION PLAN VIOLATIONS

Mercury Plastics has not developed and implemented a SWPPP that complies with the requirements of the Permit. The violations of the Permit’s SWPPP provisions described below have occurred each and every day for the last five years and will continue to occur each day for the foreseeable future.

1. Condition S3.A of the Permits requires Mercury Plastics to create and implement a SWPPP that is consistent with the Permits’ requirements and to update the SWPPP as necessary to maintain compliance with the Permits’ conditions. Mercury Plastics is violating Condition S3.A of the Permits because Mercury Plastics SWPPP is not consistent with the Permits requirements for a SWPPP, is not fully implemented, and has not been updated as necessary.

2. Condition S3.A.2 of the 2015 Permit and Condition S3.A.1 of the 2020 Permit require the SWPPP to specify BMPs necessary to provide AKART. Mercury Plastics is violating Condition S3.A.2 of the Permits because Mercury Plastics has failed to prepare a SWPPP that includes AKART BMPs and BMPs necessary to comply with state water quality standards.

3. Mercury Plastics’ SWPPP fails to satisfy Condition S3 of the Permits because it does not adequately describe the necessary BMPs. Condition S3.B.4 of the Permits requires that the SWPPP include a description of BMPs that are necessary for the facility to eliminate or reduce the potential to contaminate stormwater. Condition S3.B.4 of the Permits also requires that the SWPPP detail how and where the selected BMPs will be implemented. Condition S3.A.3 of the stormwater technical manuals of the 2015 Permit and Condition S3.A.2 of the 2020 Permit require that the SWPPP include BMPs consistent with approved stormwater technical manuals (or document how stormwater BMPs included in the SWPPP in the SWPPP are demonstratively equivalent to the practices contained in the approved stormwater technical manuals, including the proper selection, implementation, and maintenance of all applicable and appropriate BMPs). WASHINGTON STATE DEPARTMENT OF ECOLOGY, PUB. No. 19-10-021, STORMWATER MANAGEMENT MANUAL FOR WESTERN WASHINGTON (July 2019),

<https://fortress.wa.gov/ecy/ezshare/wq/Permits/Flare/2019SWMMWW/Content/Resources/DocsForDownload/2019SWMMWW.pdf> (current stormwater management manual for Western Washington). Mercury Plastics' SWPPP does not comply with these requirements because it does not adequately describe and explain in detail the BMPs selected, does not include BMPs consistent with approved stormwater technical manuals, does not include BMPs that are demonstratively equivalent to approved BMPs with documentation of BMP adequacy, or does not include preventative maintenance BMPs.

4. Mercury Plastics' SWPPP fails to satisfy the requirements of Condition S3.B.1 of the Permits because it does not include a site map that identifies significant features, stormwater drainage, and discharge structures, stormwater drainage areas for each stormwater discharge point off-site, a unique identifying number for each discharge point, each sampling location with a unique identifying number, paved areas and buildings, areas of pollutant contact associated with specific industrial activities, conditionally approved non-stormwater discharges, surface water locations, areas of existing and potential erosion, vehicle maintenance areas, and lands and waters adjacent to the site that may be helpful in identifying discharge points or drainage routes.

5. Mercury Plastics' SWPPP fails to satisfy the requirements of Condition S3.B.2 of the Permits because it fails to include a facility assessment. The SWPPP fails to include an adequate facility assessment because it does not adequately describe the industrial activities conducted at the site, the general layout of the facility including buildings and storage of raw materials, the flow of goods and materials through the facility, the regular business hours, and the seasonal variations in business hours or industrial activities.

6. Mercury Plastics' SWPPP fails to comply with Condition S3.B.2.b of the Permits because it does not include an inventory of industrial activities that identifies all areas associated with industrial activities that have been or may potentially be sources of pollutants. Specifically, the SWPPP does not identify all areas associated with outdoor storage of materials or products; outdoor manufacturing and processing; onsite dust or particulate generating processes; on-site waste treatment, storage, or disposal; vehicle and equipment fueling, maintenance, and/or cleaning; roofs or other surfaces exposed to air emissions from a manufacturing building or a process area; and roofs or other surfaces composed of materials that may be mobilized by stormwater, as required by the Permits.

7. Mercury Plastics' SWPPP does not comply with Condition S3.B.2.c of the Permits because it does not include an adequate inventory of materials. More precisely, the SWPPP does not include: an inventory of materials that lists the types of materials handled at the site that potentially may be exposed to precipitation or runoff and that could result in stormwater pollution; a short narrative for each material describing the potential for pollutants to be present in stormwater discharge that is updated when data becomes available to verify the presence or absence of pollutants; or a narrative description of any potential sources of pollutants from past activities, materials, and spills that were previously handled, treated, stored, or disposed of in a manner to allow ongoing exposure to stormwater, as required. The SWPPP also does not include the method and location of on-site storage or disposal of such materials and a list of significant spills and significant leaks of toxic or hazardous pollutants, as required by the Permits.

8. Mercury Plastics' SWPPP does not comply with Condition S3.B.3 of the Permits because it does not identify specific individuals by name or title whose responsibilities include SWPPP development, implementation, maintenance, and modification.

9. Condition S3.B.4 of the Permits requires that permittees include in their SWPPPs, and implement, certain mandatory BMPs unless site conditions render the BMP unnecessary, infeasible, or an alternative and equally effective BMP is provided. Mercury Plastics is in violation of these requirements because it has failed to include in its SWPPP, and implement, the mandatory BMPs required by the Permits, as detailed below.

10. Mercury Plastics' SWPPP does not comply with Condition S3.B.4.b.i of the Permits because it does not include required operational source control BMPs in the following categories: good housekeeping (including definition of ongoing maintenance and clean off areas that may contribute pollutants to stormwater discharges, and a schedule/frequency for each housekeeping task); preventive maintenance (including BMPs to inspect and maintain stormwater drainage and treatment facilities, source controls, treatment systems, and plant equipment and systems, and the schedule/frequency for each task); spill prevention and emergency cleanup plan (including BMPs for preventing spills that can contaminate stormwater; for material handling procedures; storage requirements; cleanup equipment and procedures; and spill logs); employee training (including an overview of what is in the SWPPP, how employees make a difference in complying with the SWPPP, spill response procedures, good housekeeping, maintenance requirements, material management practices, how training will be conducted, the frequency/schedule of training, and a log of the dates on which specific employees received training); and inspections and recordkeeping (including documentation of procedures to ensure compliance with permit requirements for inspections and recordkeeping, identification of personnel who conduct inspections, provision of a tracking or follow-up procedure to ensure that a report is prepared and appropriate action taken in response to visual monitoring, definition of how Mercury Plastics will comply with signature and record retention requirements, certification of compliance with the SWPPP and Permits, and all inspection reports completed by Mercury Plastics).

11. Mercury Plastics' SWPPP does not comply with Condition S3.B.4.b.i.7 of the Permits because it does not include measures to identify and eliminate the discharge of process wastewater, domestic wastewater, noncontact cooling water, and other illicit discharges.

12. Mercury Plastics' SWPPP does not comply with Condition S3.B.4.b.ii of the Permits because it does not include required structural source control BMPs to minimize the exposure of manufacturing, processing, and material storage areas to rain, snow, snowmelt, and runoff. Mercury Plastics' SWPPP does not comply with Condition S3.B.4.b.iii of the Permits because it does not include treatment BMPs as required.

13. Mercury Plastics' SWPPP fails to comply with Condition S3.B.4.b.v of the Permits because it does not include BMPs to prevent the erosion of soils or other earthen materials and prevent off-site sedimentation and violations of water quality standards.

14. Mercury Plastics' SWPPP does not comply with Condition S3.B.5 of the Permits

because the SWPPP fails to include all of the minimum required details of the stormwater sampling plan. The SWPPP does not include a sampling plan that: identifies points of discharge to surface waters, storm sewers, or discrete groundwater infiltration locations; documents why any discharge point is not sampled; identifies each sampling point by its unique identifying number; identifies staff responsible for conducting stormwater sampling; specifies procedures for sample collection and handling; specifies procedures for sending samples to the laboratory; identifies parameters for analysis, holding times and preservatives, laboratory quantization levels, and analytical methods; or specifies the procedure for submitting the results to Ecology.

IV. MONITORING AND REPORTING VIOLATIONS

A. Failure to Collect Quarterly Samples

Condition S4.B of the Permits requires Mercury Plastics to sample its stormwater discharge once during every calendar quarter. Conditions S.3.B.5.b and S4.B.2.c of the 2000 Permit and Conditions S3.B.5.b and S4.B.3.a of the 2020 Permit requires Mercury Plastics to collect stormwater samples at each distinct point of discharge offsite except for substantially identical outfalls for each pollutant described in Table 2 of the Permits. Mercury Plastics has violated these permit conditions each quarter during the last five years that it failed to collect stormwater samples from all distinct points of discharge, including Outfall 3, which includes all four quarters of 2016, all four quarters of 2017, all four quarters of 2018, all four quarters of 2019, all four quarters of 2020, and the first two quarters of 2021. These violations will continue until Mercury Plastics commences monitoring all distinct points of discharge.

B. Failure to Timely Submit Discharge Monitoring Reports.

Condition S9.A of the 2015 Permit and Condition S9.B of the 2020 Permit require Mercury Plastics to use DMR forms provided or approved by Ecology to summarize, report and submit monitoring data to Ecology. For each monitoring period (calendar quarter) a DMR must be completed and submitted to Ecology not later than 45 days after the end of the monitoring period. Mercury Plastics has violated these conditions by failing to submit a DMR within the time prescribed for Monitoring Point 1 for the third quarter of 2016, second quarter of 2018, first quarter of 2020, and for Monitoring Point 003 each and every quarter during the last five years.

C. Failure to Comply with Visual Monitoring Requirements

Conditions S7.A of the Permits requires that monthly inspections be conducted at the facility by qualified personnel. Condition S7.B of the Permits requires that each inspection include observations made at stormwater sampling locations and areas where stormwater associated with industrial activity is discharged; observations for the presence of floating materials, visible sheen, discoloration, turbidity, odor, etc. in the stormwater discharges; observations for the presence of illicit discharges; a verification that the descriptions of potential pollutant sources required by the Permit are accurate; a verification that the site map in the SWPPP reflects current conditional; and an assessment of all BMPs that have been implemented (noting the effectiveness of the BMPs inspected, the locations of BMPs that need maintenance,

the reason maintenance is needed and a schedule for maintenance, and locations where additional or different BMPs are needed).

Conditions S7.C of the Permits requires that Mercury Plastics record the results of each inspection in an inspection report or checklist that is maintained on-site and documents the observations, verifications, and assessments required. The report/checklist must include the time and date of the inspection, the locations inspected, a statement that, in the judgement of the person conducting the inspection and the responsible corporate officer, the facility is either in compliance or out of compliance with the SWPPP and the Permit, a summary report and schedule of implementation of the remedial actions that Mercury Plastics plans to take if the site inspection indicates that the facility is out of compliance, the name, title, signature, and certification of the person conducting the facility inspection, and a certification and signature of the responsible corporate officer or a duly authorized representative.

Mercury Plastics is in violation of these requirements of Condition S7 of the Permits because, during the last five years, it has failed to conduct each of the requisite visual monitoring and inspections, failed to prepare and maintain the requisite inspections reports or checklists, and failed to make the requisite certification and summaries.

V. CORRECTIVE ACTION VIOLATIONS

A. Failure to Implement Level One Corrective Actions.

Condition S8.B of the Permits requires Mercury Plastics take a specified action called a “Level One Corrective Action,” each time quarterly stormwater sample results exceed any of the benchmark values described in Conditions S5.A and S5.B of the Permits.

As described by Permit Condition S8.B a Level One Corrective Action requires Mercury Plastics: (1) review the SWPPP for the facility and ensure that it fully complies with Permit Condition S3 and contains the correct BMPs from the applicable Stormwater Management Manual; (2) make appropriate revisions to the SWPPP to include additional operational source control BMPs with the goal of achieving the applicable benchmark values in future discharges and sign and certify the revised SWPPP in accordance with the Permit; and (3) summarize the Level One Corrective Action in the Annual Report required under Permit Condition S9.B of the Permits. Condition S8.B of the Permits requires that Mercury Plastics implement the revised SWPPP as soon as possible and no later than the DMR due dates for the quarter the benchmark exceeded.

Conditions S5.A and S5.B of the Permits and Tables 2 and 3 of the Permits establish the following applicable benchmarks: turbidity 25 NTU; total copper 14 µg/L; and total zinc 117 µg/L.

Mercury Plastics violated the Level One Corrective Action requirements of the Permits described above by failing to conduct Level One Corrective Action in accordance with Permit conditions, including the required investigation, the required review, revision, and certification of the SWPPP, the required implementation of additional BMPs, and the required summarization

in the annual report each time quarterly stormwater sampling results were greater than a benchmark. The facility has violated the requirements of the Permits described above by failing to conduct sufficient Level One Corrective Actions in response to each benchmark exceedance that occurred within the last five years, including, but not limited to exceedances identified in Table 1 of this Notice of Intent to Sue.

B. Failure to Implement Level Two Corrective Actions.

Condition S8.C of the Permits requires Mercury Plastics take specified actions, called “Level Two Corrective Action,” each time quarterly stormwater sample results exceed any of the benchmark values described in Conditions S5.A and S5.B for any two quarters in a calendar year. The Permits establish the benchmarks applicable to Mercury Plastics, which are described in section V.A of this Notice of Intent to Sue

As described by Condition S8.C of the Permits, a Level Two Corrective Action requires that Mercury Plastics: (1) review the SWPPP for the facility and ensure that it fully complies with Condition S3 of the Permits and contains the correct BMPs from the applicable Stormwater Management Manual; (2) make appropriate revisions to the SWPPP to include additional structural source control BMPs with the goal of achieving the applicable benchmark values in future discharges and sign and certify the revised SWPPP in accordance with the Permits; and (3) summarize the Level Two Corrective Action (planned or taken) in the Annual Report required under Condition S9.B of the Permits. Condition S8.C of the Permits requires that Mercury Plastics implement the revised SWPPP as soon as possible, and no later than August 31 of the following year from the quarter the benchmark was exceeded.

Mercury Plastics has violated the requirements of the Permits described above by failing to conduct Level Two Corrective Actions for discharges from its facility in accordance with the Permits’ conditions. These violations include failure to complete the required review, revision, and recertification of the SWPPP; the required implementation of additional BMPs, including additional structural source control BMPs; and the required summarization in the Annual Report each time since January 1, 2016 its quarterly stormwater sampling results were grater than a benchmark for any two quarters during a calendar year. As indicated in Table 1 above, these violations include, but are not limited to, Mercury Plastics’ failure to fulfill these obligations for turbidity triggered by its stormwater sampling in calendar year 2016; for turbidity triggered by its stormwater sampling in calendar year 2017; for zinc triggered by its stormwater sampling in calendar year 2018; and for zinc and turbidity triggered by its stormwater sampling in calendar year 2020.

C. Failure to Implement Level Three Corrective Actions.

Condition S8.D of the Permits require Mercury Plastics to take a specified action, called a “Level Three Corrective Action,” each time quarterly stormwater sample results exceed an applicable benchmark value or are outside the benchmark value for any three quarters during a calendar year. The Permits establish the benchmarks applicable to Mercury Plastics, which are described in section V.A of this Notice of Intent to Sue.

As described in Condition S8.D of the Permits, a Level Three Corrective Action requires Mercury Plastics to (1) review the SWPPP for the facility and insure that it fully complies with Condition S3 of the Permits; (2) make appropriate revisions to the SWPPP to include additional treatment BMPs with the goal of achieving the applicable benchmark value(s) in future discharges and additional operational and/or structural source control BMPs if necessary for proper function and maintenance of treatment BMPs, and sign and certify the revised SWPPP in accordance with Condition S3.A.6 of the 2015 Permit and Condition S3.A.5 of the 2020 Permit; and (3) summarize the Level Three Corrective Action (planned or taken) in the Annual Report required under Condition S9.B of the 2015 Permit and Condition S9.C of the 2020 Permit, including information on how monitoring, assessment, or evaluation information was (or will be) used to determine whether existing treatment BMPs will be modified/enhanced, or if new/additional treatment BMPs will be installed. Condition S8.D.2 of the Permits require that a Qualified Industrial Stormwater Professional review the revised SWPPP, sign its certification form, and certify that it is reasonably expected to meet benchmarks upon implementation.

Condition S8.D.3 of the Permits require that, before installing BMPs that require the site-specific design or sizing of structures, equipment, or processes to collect, convey, treat, reclaim, or dispose of industrial stormwater, that Mercury Plastics submit an engineering report (including the alternatives considered and why the option was selected; design data; results expected; a statement that the proposed treatment is reasonably expected to meet the benchmarks, supported by sound engineering justification; and certification by a licensed professional engineer), and an operations and maintenance manual to Ecology for review. The engineering report must be submitted no later than May 15 prior to the Level Three Corrective Action Deadline. The operations and maintenance manual must be submitted to Ecology no later than 30 days after construction/installation is complete.

Condition S8.D.5 of the Permits require Mercury Plastics fully implement the revised SWPPP according to Condition S3 of the Permits and the applicable stormwater management manual as soon as possible, and no later than September 30th of the following year.

Mercury Plastics has violated and continues to violate Condition S8.D of the Permits by failing to conduct a Level Three Corrective Action in accordance with permit conditions, including: the required review, revision and certification of the SWPPP; the requirement to have a specified professional design and stamp the portion of the SWPPP pertaining to treatment; the required implementation of additional BMPs, including additional treatment BMPs; the required submission of an engineering report, plans, specifications, and an operations and maintenance plan, and the required summarization in the annual report each time since January 1, 2016 its quarterly stormwater sampling results were greater than a benchmark for any three quarters during a calendar year. As indicated in Table 1 above, these violations include, but are not limited to, Mercury Plastics failed to fulfill these obligations for turbidity and zinc triggered by its stormwater sampling during calendar year 2020.

VI. ANNUAL REPORT VIOLATIONS

Condition S9.C of the Permits requires Mercury Plastics to submit and complete accurate annual reports to Ecology, no later than May 15th of each year using Ecology's Water Quality Permitting Portal.

As described by Condition S9.C of the Permits, annual reports shall include corrective action documentation, and if a corrective action is not complete, Mercury Plastics must describe the status of any outstanding corrective actions. Each annual report must (1) identify the condition triggering the need for corrective action review; (2) describe the problem(s) and identify the dates they were discovered; (3) summarize any Level One, Two and/or Three Corrective Actions completed during the previous calendar year and include the dates of completion; and (4) describe the status of any Level Two or Three corrective actions triggered during the previous calendar year and identify the date of expected completion. Mercury Plastics must also retain a copy of all annual reports onsite. Mercury Plastics violated the requirements of the Permits described above by failing to submit complete and accurate annual reports as required for years 2016, 2017, 2018, 2019, and 2020.

VII. VIOLATIONS OF REPORTING AND RECORDKEEPING REQUIREMENTS

A. Failure to Record Information

Condition S4.B.4 of the Permits requires Mercury Plastics record and retain specified information for each stormwater sample taken, including the sample date and time, a notation describing if Mercury Plastics collected the sample within the first 12 hours of stormwater discharge event, an explanation of why Mercury Plastics could not collect a sample within the first 12 hours of a stormwater discharge event, the sample location, method of sample and of preservation, and the individual who performing the sampling. Mercury Plastics is in violation of these conditions as it has not recorded each of these specified items for each sample taken since obtaining Permit coverage.

B. Failure to Retain Records

Condition S4 and S9.D of the Permits requires Mercury Plastics to retain, for a minimum of five years, a copy of the current Permit, a copy of the Mercury Plastics' coverage letter, records of all sampling information and laboratory documentation, inspection reports including required document, any other documentation of compliance with permit requirements, all equipment calibration records, all BMP maintenance records, all original recordings for continuous sampling instrumentation, copies of all laboratory results, copies of all required reports, and records of all data used to complete the application for the Permit. Mercury Plastics is in violation of these conditions because it has failed to retain records of such information, reports, and other documentation since obtaining Permit coverage.

VIII. FAILURE TO REPORT PERMIT VIOLATIONS

Condition S9.F of the Permits requires Mercury Plastics to take certain action in the event that Mercury Plastics is unable to comply with any of the terms and conditions of the Permits which may endanger human health or the environment, or exceed any numeric effluent limitations in the Permit. In such circumstances, Mercury Plastics must immediately take action to minimize potential pollution or otherwise stop the noncompliance and correct the problem, and Mercury Plastics must immediately notify the appropriate Ecology regional office of the failure to comply. Mercury Plastics must then submit a detailed written report to Ecology, including specified details, within 5 days of the time Mercury Plastics became aware of the circumstances, unless Ecology requests an earlier submission.

On information and belief, Mercury Plastics routinely violates these requirements, including each and every time Mercury Plastics failed to comply with the corrective action requirements described in Section V of this Notice of Intent to Sue, each and every time Mercury Plastics failed to sample a discharge point, and each and every time Mercury Plastics discharged stormwater with concentrations of pollutants in excess of the Permit benchmarks and water quality criteria described above. All these violations may endanger human health and/or the environment.

IX. REQUEST FOR SWPPP

Pursuant to Condition S9.G of the Permits, Columbia Riverkeeper hereby requests that Mercury Plastics provide Riverkeeper a copy of, or access to, Mercury Plastics' SWPPP complete with all incorporated plans, monitoring reports, checklists, and training and inspection logs within 14 days of receipt of this Notice. The copy of the SWPPP and any other communications about this request should be directed to the undersigned at the address below.

Should Mercury Plastics fail to provide the requested complete copy of, or access to, its SWPPP as required by Condition S9.F of the Permits, Mercury Plastics will be in violation of that condition, which violation shall also be subject to this Notice of Intent to Sue and any resulting lawsuit.

X. PARTY GIVING NOTICE OF INTENT TO SUE

The full name, address, and telephone number of the party giving notice is:

Columbia Riverkeeper
407 Portway Ave, Suite 301
Hood River, OR 97031
(541) 399-5312

XI. ATTORNEYS REPRESENTING RIVERKEEPER

The attorneys representing Columbia Riverkeeper in this matter are:

Simone Anter, Staff Attorney
Columbia Riverkeeper
407 Portway Ave, Suite 301
Hood River, OR 97031
(541) 399-5312
simone@columbiariverkeeper.org

Alyssa Koepfgen, Attorney
Claire Tonry, Attorney
Smith & Lowney, PLLC
2317 E. John St.
Seattle, WA 98112
Main: (206) 860-2883
Direct: (206) 860-1394
alyssa@smithandlowney.com
claire@smithandlowney.com

XII. CONCLUSION

The above-described violations reflect those indicated by the information currently available to Columbia Riverkeeper based on its review of the public record. These violations are ongoing. Columbia Riverkeeper intends to sue for all violations, including those yet to be uncovered and those committed after the date of this Notice of Intent to Sue.

Under Section 309(d) of the CWA, 33 U.S.C § 1319(d), Mercury Plastics is subject to a separate daily penalty assessment for each violation (the current maximum daily penalty assessment is 37,500 per day for each violation that occurred through November 2, 2015 and \$56,460 for each violation thereafter). In addition to civil penalties, Columbia Riverkeeper will seek injunctive relief to prevent further violations under Sections 505(a) and (d) of the Clean Water Act, 33 U.S.C. § 1365(a) and (d), and such other relief as is permitted by law. Also, Section 505(d) of the Clean Water Act, 33 U.S.C. § 1365(d), permits prevailing parties to recover costs, including attorney's fees.

Columbia Riverkeeper believes that this NOTICE OF INTENT TO SUE sufficiently states grounds for filing suit. Columbia Riverkeeper intends, at the close of the 60-day notice period, or shortly thereafter, to file a citizen suit against Mercury Plastics under Section 505(a) of the Clean Water Act for the violations described herein.

Columbia Riverkeeper is willing to discuss effective remedies for the violations described in this letter and settlement terms during the 60-day notice period. If you wish to pursue such discussions in the absence of litigation, we suggest that you initiate those discussions within ten (10) days of receiving this notice so that a meeting can be arranged and so that negotiations may be completed promptly. We do not intend to delay the filing of a complaint if discussions are continuing when the notice period ends. If you believe that any of the allegations in this notice are incorrect or based on incomplete information in the public record,

please bring those facts to our attention.

Sincerely,

SMITH & LOWNEY, PLLC



Alyssa Koepfgen

cc: Michael Regan, Administrator, U.S. EPA
Michelle Pirzadeh, Region 10 Administrator, U.S. EPA
Laura Watson, Director, Washington Department of Ecology
Registered Agent, Mercury Plastics, 3807 SE Hidden Way, Vancouver, WA 98661

Record of Climatological Observations

These data are quality controlled and may not be identical to the original observations.

Generated on 08/13/2021

Year	Month	Day	Temperature (F)			Precipitation			Evaporation			8 in. Depth			Soil Temperature (F)		
			24 Hrs. Ending at Observation Time	At Obs.	24 Hour Amounts Ending at Observation Time	Rain, Melted Snow, Etc. (in)	Snow, Ice Pellets, Hail (in)	Fog	24 Hour Wind Movement (mi)	Amount of Evap. (in)	Ground Cover (see *)	Max.	Min.	Ground Cover (see *)	Max.	Min.	Ground Cover (see *)
2016	08	01															
2016	08	02															
2016	08	03															
2016	08	04															
2016	08	05															
2016	08	06															
2016	08	07															
2016	08	08															
2016	08	09															
2016	08	10															
2016	08	11															
2016	08	12															
2016	08	13	93	62		0.00				0.0		0.0					
2016	08	14	86	59		0.00				0.0		0.0					
2016	08	15	86	59		0.00				0.0		0.0					
2016	08	16	85	59		0.00				0.0		0.0					
2016	08	17	82	58		0.00				0.0		0.0					
2016	08	18	98	57		0.00				0.0		0.0					
2016	08	19	99	60		0.00				0.0		0.0					
2016	08	20	99	60		0.00				0.0		0.0					
2016	08	21	80	57		0.00				0.0		0.0					
2016	08	22	74	49		0.00				0.0		0.0					
2016	08	23	84	52		0.00				0.0		0.0					
2016	08	24	91	53		0.00				0.0		0.0					
2016	08	25	94	57		0.00				0.0		0.0					
2016	08	26	96	58		0.00				0.0		0.0					
2016	08	27	82	59		0.00				0.0		0.0					
2016	08	28	84	54		0.00				0.0		0.0					
2016	08	29	85	55		0.00				0.0		0.0					
2016	08	30	72	57		0.00				0.0		0.0					
2016	08	31	69	55		0.07				0.0		0.0					
		Summary	86	57		0.07											

Empty, or blank, cells indicate that a data observation was not reported.

*Ground Cover: 1=Grass; 2=Fallow; 3=Bare Ground; 4=Brome grass; 5=Sod; 6=Straw mulch; 7=Grass muck; 8=Bare muck; 0=Unknown

"S" This data value failed one of NCDC's quality control tests.

"T" values in the Precipitation or Snow category above indicate a "trace" value was recorded.

"A" Values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.

Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.
Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.

Record of Climatological Observations

These data are quality controlled and may not be identical to the original observations.

Generated on 08/13/2021

National Centers for Environmental Information
151 Patton Avenue
Asheville, North Carolina 28801
Observation Time Temperature: Unknown Observation Time Precipitation: Unknown

Year	Month	Day	Temperature (F)			Precipitation			Evaporation			8 in. Depth			Soil Temperature (F)		
			24 Hrs. Ending at Observation Time	At Obs.	24 Hour Amounts Ending at Observation Time	Rain, Melted Snow, Etc. (in)	F - Snow, Ice Pellets, Hail (in)	F - Snow, Ice Pellets, Hail (in)	At Obs. Time	24 Hour Wind Movement (mi)	Amount of Evap. (in)	Ground Cover (see *)	Max.	Min.	Ground Cover (see *)	Max.	Min.
2016	09	01	69	55	0.06	0.0	0.0	0.0	0.0	0.0	0.0						
2016	09	02	67	51	0.16	0.0	0.0	0.0	T	0.0	0.0						
2016	09	03	68	48	0.00	0.0	0.0	0.0		0.0	0.0						
2016	09	04	70	49	0.01	0.0	0.0	0.0		0.0	0.0						
2016	09	05	71	48	0.20	0.0	0.0	0.0		0.0	0.0						
2016	09	06	68	56	0.00	0.0	0.0	0.0		0.0	0.0						
2016	09	07	73	58	0.00	0.0	0.0	0.0		0.0	0.0						
2016	09	08	74	57	0.00	0.0	0.0	0.0	T	0.0	0.0						
2016	09	09	84	49	0.00	0.0	0.0	0.0		0.0	0.0						
2016	09	10	85	50	0.00	0.0	0.0	0.0		0.0	0.0						
2016	09	11	72	50	0.00	0.0	0.0	0.0		0.0	0.0						
2016	09	12	79	46	0.00	0.0	0.0	0.0		0.0	0.0						
2016	09	13	81	49	0.00	0.0	0.0	0.0		0.0	0.0						
2016	09	14	79	45	0.00	0.0	0.0	0.0		0.0	0.0						
2016	09	15	80	50	0.00	0.0	0.0	0.0		0.0	0.0						
2016	09	16	83	50	0.00	0.0	0.0	0.0		0.0	0.0						
2016	09	17	62	56	0.68	0.0	0.0	0.0		0.0	0.0						
2016	09	18	72	52	0.00	0.0	0.0	0.0	T	0.0	0.0						
2016	09	19	66	50	0.00	0.0	0.0	0.0		0.0	0.0						
2016	09	20	72	45	0.00	0.0	0.0	0.0		0.0	0.0						
2016	09	21	74	49	0.00	0.0	0.0	0.0		0.0	0.0						
2016	09	22	67	46	0.00	0.0	0.0	0.0		0.0	0.0						
2016	09	23	62	49	0.04	0.0	0.0	0.0		0.0	0.0						
2016	09	24	70	48	0.00	0.0	0.0	0.0		0.0	0.0						
2016	09	25	84	49	0.00	0.0	0.0	0.0		0.0	0.0						
2016	09	26	88	52	0.00	0.0	0.0	0.0		0.0	0.0						
2016	09	27	75	59	0.00	0.0	0.0	0.0		0.0	0.0						
2016	09	28	75	47	0.00	0.0	0.0	0.0		0.0	0.0						
2016	09	29	70	47	0.00	0.0	0.0	0.0		0.0	0.0						
2016	09	30	69	42	0.00	0.0	0.0	0.0		0.0	0.0						
		Summary	74	50	1.15												

Empty, or blank, cells indicate that a data observation was not reported.

*Ground Cover: 1=Grass; 2=Fallow; 3=Bare Ground; 4=Brome grass; 5=Sod; 6=Straw mulch; 7=Grass muck; 8=Bare muck; 0=Unknown

"S" This data value failed one of NCDC's quality control tests.

"T" values in the Precipitation or Snow category above indicate a "trace" value was recorded.

"A" values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.

Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.

Record of Climatological Observations

These data are quality controlled and may not be identical to the original observations.

Generated on 08/13/2021

Observation Time Temperature: Unknown Observation Time Precipitation: Unknown

Case 3:21-cv-05784 Document 1 Filed 10/21/21 Page 33 of 91

Year	Month	Day	Temperature (F)		Precipitation			Evaporation			8 in. Depth			Soil Temperature (F)		
			24 Hrs. Ending at Observation Time	At Obs.	Rain, Melted Snow, Etc. (in)	F - Snow, Ice Pellets, Hail (in)	F - Snow, Ice Pellets, Hail (in)	24 Hour Wind Movement (mi)	Amount of Evap. (in)	Ground Cover (see *)	Max.	Min.	Ground Cover (see *)	Max.	Min.	
2016	10	01	64	53	0.25	0.0	0.0									
2016	10	02	61	53	0.25	0.0	0.0									
2016	10	03	61	49	0.04	0.0	0.0									
2016	10	04	63	54	0.18	0.0	0.0									
2016	10	05	64	55	0.23	0.0	0.0									
2016	10	06	62	55	0.21	0.0	0.0									
2016	10	07	61	55	0.23	0.0	0.0									
2016	10	08	69	57	0.09	0.0	0.0									
2016	10	09	62	50	0.70	0.0	0.0									
2016	10	10	62	40	0.00	0.0	0.0									
2016	10	11	66	41	0.00	0.0	0.0									
2016	10	12	65	39	0.02	0.0	0.0									
2016	10	13	61	51	2.06	0.0	0.0									
2016	10	14	66	53	0.46	0.0	0.0									
2016	10	15	65	54	0.57	0.0	0.0									
2016	10	16	59	52	0.26	0.0	0.0									
2016	10	17	61	50	0.47	0.0	0.0									
2016	10	18	59	47	0.04	0.0	0.0									
2016	10	19	61	43	0.21	0.0	0.0									
2016	10	20	63	52	0.19	0.0	0.0									
2016	10	21	62	52	0.18	0.0	0.0									
2016	10	22	63	48	0.06	0.0	0.0									
2016	10	23	61	51	0.06	0.0	0.0									
2016	10	24	61	48	0.07	0.0	0.0									
2016	10	25	62	50	0.01	0.0	0.0									
2016	10	26	62	53	0.73	0.0	0.0									
2016	10	27	59	53	0.16	0.0	0.0									
2016	10	28	66	52	0.01	0.0	0.0									
2016	10	29	61	48	0.12	0.0	0.0									
2016	10	30	56	43	0.15	0.0	0.0									
2016	10	31	56	50	0.21	0.0	0.0									
		Summary	62	50	8.22	0.0	0.0									

Empty, or blank, cells indicate that a data observation was not reported.

*Ground Cover: 1=Grass; 2=Fallow; 3=Bare Ground; 4-Brome grass; 5=Sod; 6=Straw mulch; 7=Grass muck; 8=Bare muck; 0=Unknown

"S" This data value failed one of NCDC's quality control tests.

"T" values in the Precipitation or Snow category above indicate a "trace" value was recorded.

"A" Values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.

Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.

Record of Climatological Observations

These data are quality controlled and may not be identical to the original observations.

Generated on 08/13/2021

Observation Time Temperature: Unknown Observation Time Precipitation: Unknown

Case 3:21-cv-05784 Document 1 Filed 10/21/21 Page 34 of 91

Year	Month	Day	24 Hrs. Ending at Observation Time		At Obs.	24 Hour Amounts Ending at Observation Time			At Obs. Time	Evaporation			8 in. Depth			Soil Temperature (F)		
			Max.	Min.		Rain, Melted Snow, Etc. (in)	F - Snow, Ice Pellets, Hail (in)	F - Snow, Ice Pellets, Hail (in)		24 Hour Wind Movement (mi)	Amount of Evap. (in)	Ground Cover (see *)	Max.	Min.	Ground Cover (see *)	Max.	Min.	
2016	11	01	61	51	T	0.0	0.0	0.0										
2016	11	02	65	53		0.05	0.0	0.0										
2016	11	03	64	45		0.00	0.0	0.0										
2016	11	04	68	41		0.00	0.0	0.0										
2016	11	05	58	54		0.98	0.0	0.0										
2016	11	06	61	52	T	0.0	0.0	0.0										
2016	11	07	63	51		0.00	0.0	0.0										
2016	11	08	68	42		0.00	0.0	0.0										
2016	11	09	64	50		0.05	0.0	0.0										
2016	11	10	68	44		0.00	0.0	0.0										
2016	11	11	62	50		0.01	0.0	0.0										
2016	11	12	63	50		0.05	0.0	0.0										
2016	11	13	58	48		0.07	0.0	0.0										
2016	11	14	56	54		0.99	0.0	0.0										
2016	11	15	60	46		0.20	0.0	0.0										
2016	11	16	51	45		0.06	0.0	0.0										
2016	11	17	54	36	T	0.0	0.0	0.0										
2016	11	18	52	34	T	0.0	0.0	0.0										
2016	11	19	54	45		0.12	0.0	0.0										
2016	11	20	56	48		0.14	0.0	0.0										
2016	11	21	56	45		0.02	0.0	0.0										
2016	11	22	53	45		0.55	0.0	0.0										
2016	11	23	51	45		0.17	0.0	0.0										
2016	11	24	54	47		2.05	0.0	0.0										
2016	11	25	50	46		0.27	0.0	0.0										
2016	11	26	56	44		0.47	0.0	0.0										
2016	11	27	49	44		0.32	0.0	0.0										
2016	11	28	53	41		0.08	0.0	0.0										
2016	11	29	52	42		0.12	0.0	0.0										
2016	11	30	50	41		0.11	0.0	0.0										
		Summary	58	46		6.88												

Empty, or blank, cells indicate that a data observation was not reported.

*Ground Cover: 1=Grass; 2=Fallow; 3=Bare Ground; 4=Brome grass; 5=Sod; 6=Straw mulch; 7=Grass muck; 8=Bare muck; 0=Unknown

"S" This data value failed one of NCDC's quality control tests.

"T" values in the Precipitation or Snow category above indicate a "trace" value was recorded.

"A" values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.

Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.

Record of Climatological Observations

These data are quality controlled and may not be identical to the original observations.

Generated on 08/13/2021

Observation Time Temperature: Unknown Observation Time Precipitation: Unknown

Case 3:21-cv-05784 Document 1 Filed 10/21/21 Page 35 of 91

Year	Month	Day	Temperature (F)		Precipitation			Evaporation			8 in. Depth			Soil Temperature (F)		
			24 Hrs. Ending at Observation Time	At Obs.	Rain, Melted Snow, Etc. (in)	F - Snow, Ice Pellets, Hail (in)	F - Snow, Ice Pellets, Hail (in)	24 Hour Wind Movement (mi)	Amount of Evap. (in)	Ground Cover (see *)	Max.	Min.	Ground Cover (see *)	Max.	Min.	
2016	12	01	47	37	0.04	0.0	0.0	0.0	0.0							
2016	12	02	47	44	0.09	0.0	0.0	0.0	0.0							
2016	12	03	52	39	0.18				0.0							
2016	12	04	48	33	0.49				0.0							
2016	12	05	40	34	0.30				0.0							
2016	12	06	44	26	T				0.0							
2016	12	07	40	27	0.00				0.0							
2016	12	08	34	29	0.01				0.0							
2016	12	09	34	32	0.74				0.0							
2016	12	10	44	32	0.42				0.0							
2016	12	11	48	41	0.41				0.0							
2016	12	12	47	35	0.05				0.0							
2016	12	13	41	32	0.00				0.0							
2016	12	14	36	28	T				0.0							
2016	12	15	33	23	T				0.0							
2016	12	16	38	23	0.00				0.0							
2016	12	17	35	29	T				0.0							
2016	12	18	37	25	0.00				0.0							
2016	12	19	47	30	0.86				0.0							
2016	12	20	52	34	0.45				0.0							
2016	12	21	39	29	0.00				0.0							
2016	12	22	41	30	0.01				0.0							
2016	12	23	47	28	0.23				0.0							
2016	12	24	41	29	T				0.0							
2016	12	25	44	31	T				0.0							
2016	12	26	40	27	0.23				0.0							
2016	12	27	48	36	0.11				0.0							
2016	12	28	42	32	T				0.0							
2016	12	29	41	34	0.03				0.0							
2016	12	30	45	28	0.01				0.0							
2016	12	31	37	34	0.10				0.0							
		Summary	42	31	4.76				0.0							

Empty, or blank, cells indicate that a data observation was not reported.

*Ground Cover: 1=Grass; 2=Fallow; 3=Bare Ground; 4-Brome grass; 5=Sod; 6=Straw mulch; 7=Grass muck; 8=Bare muck; 0=Unknown

"S" This data value failed one of NCDC's quality control tests.

"T" values in the Precipitation or Snow category above indicate a "trace" value was recorded.

"A" Values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.

Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.

Record of Climatological Observations

These data are quality controlled and may not be identical to the original observations.

Generated on 08/13/2021

Observation Time Temperature: Unknown Observation Time Precipitation: Unknown

Case 3:21-cv-05784 Document 1 Filed 10/21/21 Page 36 of 91

Year	Month	Day	Temperature (F)		Precipitation			Evaporation			8 in. Depth			Soil Temperature (F)		
			24 Hrs. Ending at Observation Time	At Obs.	Rain, Melted Snow, Etc. (in)	F - Snow, Ice Pellets, Hail (in)	F - Snow, Ice Pellets, Hail (in)	24 Hour Wind Movement (mi)	Amount of Evap. (in)	Ground Cover (see *)	Max.	Min.	Ground Cover (see *)	Max.	Min.	
2017	01	01	41	31	0.08				0.0							
2017	01	02	36	30	0.00				0.0							
2017	01	03	35	28	0.00				0.0							
2017	01	04	35	27	0.00				0.0							
2017	01	05	35	15	0.00				0.0							
2017	01	06	34	14	0.00				0.0							
2017	01	07	31	24	0.01				0.0							
2017	01	08	36	29	0.55				0.0							
2017	01	09	41	32	0.25				0.0							
2017	01	10	40	31	0.70				0.0							
2017	01	11	32	25	0.12				0.0							
2017	01	12	33	10	0.00				0.0							
2017	01	13	28	8	0.00				0.0							
2017	01	14	30	8	0.00				0.0							
2017	01	15	30	12	0.00				0.0							
2017	01	16	30	23	0.00				0.0							
2017	01	17	34	25	0.74				0.0							
2017	01	18	48	33	1.06				0.0							
2017	01	19	52	37	T				0.0							
2017	01	20	43	35	0.29				0.0							
2017	01	21	48	37	0.35				0.0							
2017	01	22	46	33	0.14				0.0							
2017	01	23	50	30	T				0.0							
2017	01	24	41	30	T				0.0							
2017	01	25	45	35	0.01				0.0							
2017	01	26	49	34	T				0.0							
2017	01	27	48	28	0.00				0.0							
2017	01	28	44	28	0.00				0.0							
2017	01	29	46	31	0.01				0.0							
2017	01	30	45	36	0.00				0.0							
2017	01	31	42	30	T				0.0							
		Summary	40	27	4.31				0.0							

Empty, or blank, cells indicate that a data observation was not reported.

*Ground Cover: 1=Grass; 2=Fallow; 3=Bare Ground; 4-Brome grass; 5=Sod; 6=Straw mulch; 7=Grass muck; 8=Bare muck; 0=Unknown

"S" This data value failed one of NCDC's quality control tests.

"T" = Temperature at time of observation

"A" values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.

Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.

Record of Climatological Observations

These data are quality controlled and may not be identical to the original observations.

Generated on 08/13/2021

National Centers for Environmental Information
151 Patton Avenue
Asheville, North Carolina 28801
Observation Time Temperature: Unknown Observation Time Precipitation: Unknown

Case 3:21-cv-05784 Document 1 Filed 10/21/21 Page 37 of 91

Year	Month	Day	Temperature (F)			Precipitation			Evaporation			8 in. Depth			Soil Temperature (F)		
			24 Hrs. Ending at Observation Time	At Obs.	24 Hour Amounts Ending at Observation Time	Rain, Melted Snow, Etc. (in)	F - Snow, Ice Pellets, Hail (in)	F - Snow, Ice Hail, Ice on Ground (in)	24 Hour Wind Movement (mi)	Amount of Evap. (in)	At Obs. Time	Snow, Ice Pellets, Hail, Ice on Ground (in)	Ground Cover (see *)	Max.	Min.	Ground Cover (see *)	Max.
2017	02	01	41	29	0.00	T	0.0	0.0	0.0	0.0	0.0						
2017	02	02	40	34													
2017	02	03	35	32	0.59												
2017	02	04	52	34	0.48												
2017	02	05	46	35	2.15												
2017	02	06	44	35	0.05												
2017	02	07	40	33	0.07												
2017	02	08	38	36	1.09												
2017	02	09	59	37	1.01												
2017	02	10	50	34	0.19												
2017	02	11	50	33	0.00												
2017	02	12	52	31	0.00												
2017	02	13	54	27	0.00												
2017	02	14	49	29	0.03												
2017	02	15	43	39	1.06												
2017	02	16	50	41	1.40												
2017	02	17	58	41	0.01												
2017	02	18	48	42	0.23												
2017	02	19	51	41	0.32												
2017	02	20	50	41	0.81												
2017	02	21	50	36	0.44												
2017	02	22	45	30	0.01												
2017	02	23	46	31	T												
2017	02	24	41	34	0.08												
2017	02	25	48	30	T												
2017	02	26	44	38	0.28												
2017	02	27	44	37	0.07												
2017	02	28	50	34	0.01												
		Summary 47	35		10.38												

Empty, or blank, cells indicate that a data observation was not reported.

*Ground Cover: 1=Grass; 2=Fallow; 3=Bare Ground; 4=Brome grass; 5=Sod; 6=Straw mulch; 7=Grass muck; 8=Bare muck; 0=Unknown

"s" This data value failed one of NCDC's quality control tests.

"At Obs." = Temperature at time of observation

"T" values in the Precipitation or Snow category above indicate a "trace" value was recorded.

"A" values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.

Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.

Record of Climatological Observations

These data are quality controlled and may not be identical to the original observations.

Generated on 08/13/2021

Year	Month	Day	Temperature (F)			Precipitation			Evaporation			8 in. Depth			Soil Temperature (F)		
			24 Hrs. Ending at Observation Time	At Obs.	24 Hour Amounts Ending at Observation Time	Rain, Melted Snow, Etc. (in)	F - Snow, Ice Pellets, Hail (in)	F - Snow, Ice Pellets, Hail (in)	24 Hour Wind Movement (mi)	Amount of Evap. (in)	Ground Cover (see *)	Max.	Min.	Ground Cover (see *)	Max.	Min.	Min.
2017	03	01	51	40	0.01					0.0							
2017	03	02	51	38	0.08					0.0							
2017	03	03	52	41	0.10					0.0							
2017	03	04	48	35	0.14					0.0							
2017	03	05	47	36	0.10					0.0							
2017	03	06	46	35	0.09					0.0							
2017	03	07	50	41	0.47					0.0							
2017	03	08	46	42	0.32					0.0							
2017	03	09	59	42	0.52					0.0							
2017	03	10	61	44	T					0.0							
2017	03	11	58	39	0.30					0.0							
2017	03	12	62	47	0.00					0.0							
2017	03	13	53	47	0.67					0.0							
2017	03	14	58	50	0.57					0.0							
2017	03	15	57	46	0.63					0.0							
2017	03	16	56	36	0.00					0.0							
2017	03	17	48	35	0.36					0.0							
2017	03	18	56	33	0.38					0.0							
2017	03	19	57	30	0.00					0.0							
2017	03	20	56	35	0.12					0.0							
2017	03	21	57	44	0.23					0.0							
2017	03	22	55	41	0.03					0.0							
2017	03	23	58	44	0.39					0.0							
2017	03	24	54	47	0.58					0.0							
2017	03	25	56	43	0.01					0.0							
2017	03	26	51	45	0.62					0.0							
2017	03	27	55	46	0.04					0.0							
2017	03	28	59	47	0.07					0.0							
2017	03	29	59	47	0.20					0.0							
2017	03	30	57	41	0.02					0.0							
2017	03	31	57	37	0.00					0.0							
		Summary	55	41	7.05												

Empty, or blank, cells indicate that a data observation was not reported.

*Ground Cover: 1=Grass; 2=Fallow; 3=Bare Ground; 4-Brome grass; 5=Sod; 6=Straw mulch; 7=Grass muck; 8=Bare muck; 0=Unknown

"S" This data value failed one of NCDC's quality control tests.

"T" values in the Precipitation or Snow category above indicate a "trace" value was recorded.

"A" Values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.

Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.

Record of Climatological Observations

These data are quality controlled and may not be identical to the original observations.

Generated on 08/13/2021

National Centers for Environmental Information
151 Patton Avenue
Asheville, North Carolina 28801
Observation Time Temperature: Unknown Observation Time Precipitation: Unknown

Case 3:21-cv-05784 Document 1 Filed 10/21/21 Page 39 of 91

Year	Month	Day	Temperature (F)			Precipitation			Evaporation			8 in. Depth			Soil Temperature (F)			
			24 Hrs. Ending at Observation Time	At Obs.	24 Hour Amounts Ending at Observation Time	Rain, Melted Snow, Etc. (in)	F- Snow, Ice Pellets, Hail (in)	F- Snow, Ice Pellets, Hail (in)	24 Hour Wind Movement (mi)	Amount of Evap. (in)	At Obs. Time	Snow, Ice Hail, Ice on Ground (in)	Ground Cover (see *)	Max.	Min.	Ground Cover (see *)	Max.	Min.
2017	04	01	59	47	0.05	T												
2017	04	02	57	37														
2017	04	03	57	35	0.00		0.0											
2017	04	04	60	43	0.02		0.0											
2017	04	05	62	46	0.00		0.0											
2017	04	06	62	47			0.63											
2017	04	07	58	46			0.20											
2017	04	08	54	42			0.04											
2017	04	09	58	40			0.08											
2017	04	10	55	42			0.05											
2017	04	11	60	36			0.17											
2017	04	12	60	47			0.50											
2017	04	13	54	44			0.05											
2017	04	14	55	42			0.08											
2017	04	15	60	37			0.00											
2017	04	16	66	38			T											
2017	04	17	58	49			0.19											
2017	04	18	64	49			0.04											
2017	04	19	57	48			0.42											
2017	04	20	60	44			0.07											
2017	04	21	71	39			0.00											
2017	04	22	63	50			0.16											
2017	04	23	56	48			0.20											
2017	04	24	54	45			0.83											
2017	04	25	55	46			0.12											
2017	04	26	59	45			0.15											
2017	04	27	56	43			0.12											
2017	04	28	61	39			0.00											
2017	04	29	64	38			0.07											
2017	04	30	60	42			0.01											
		Summary	59	43			4.25											

Empty, or blank, cells indicate that a data observation was not reported.

*Ground Cover: 1=Grass; 2=Fallow; 3=Bare Ground; 4=Brome grass; 5=Sod; 6=Straw mulch; 7=Grass muck; 8=Bare muck; 0=Unknown

"S" This data value failed one of NCDC's quality control tests.

"T" values in the Precipitation or Snow category above indicate a "trace" value was recorded.

"A" values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.

Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.

Record of Climatological Observations

These data are quality controlled and may not be identical to the original observations.

Generated on 08/13/2021

Observation Time Temperature: Unknown Observation Time Precipitation: Unknown

Case 3:21-cv-05784 Document 1 Filed 10/21/21 Page 40 of 91

Year	Month	Day	Temperature (F)		Precipitation			Evaporation			8 in. Depth			Soil Temperature (F)		
			24 Hrs. Ending at Observation Time	At Obs.	Rain, Melted Snow, Etc. (in)	F - Snow, Ice Pellets, Hail (in)	F - Snow, Ice Pellets, Hail (in)	24 Hour Wind Movement (mi)	Amount of Evap. (in)	Ground Cover (see *)	Max.	Min.	Ground Cover (see *)	Max.	Min.	
2017	05	01	55	39	0.02	0.0	0.0									
2017	05	02	61	50	0.12	0.0	0.0									
2017	05	03	83	56	0.00	0.0	0.0									
2017	05	04	85	56	T	0.0	0.0									
2017	05	05	61	48	0.18	0.0	0.0									
2017	05	06	62	39	0.00	0.0	0.0									
2017	05	07	66	39	0.00	0.0	0.0									
2017	05	08	73	41	0.00	0.0	0.0									
2017	05	09	75	44	0.00	0.0	0.0									
2017	05	10	74	50	0.00	0.0	0.0									
2017	05	11	61	49	0.14	0.0	0.0									
2017	05	12	56	47	0.07	0.0	0.0									
2017	05	13	55	45	0.59	0.0	0.0									
2017	05	14	62	48	0.05											
2017	05	15	60	44	0.21											
2017	05	16	57	48	0.29											
2017	05	17	58	48	0.11											
2017	05	18	70	41	T											
2017	05	19	75	50	0.00	0.0	0.0									
2017	05	20	73	55	0.00	0.0	0.0									
2017	05	21	84	51	0.00	0.0	0.0									
2017	05	22	92	53	0.00	0.0	0.0									
2017	05	23	85	52	0.00	0.0	0.0									
2017	05	24	66	48	0.00	0.0	0.0									
2017	05	25	75	46	0.00	0.0	0.0									
2017	05	26	84	50	0.00	0.0	0.0									
2017	05	27	90	52	0.00	0.0	0.0									
2017	05	28	85	56	0.00	0.0	0.0									
2017	05	29	72	55	0.00	0.0	0.0									
2017	05	30	60	54	0.00	0.0	0.0									
2017	05	31	74	53	0.01	0.0	0.0									
		Summary	71	49	1.79											

Empty, or blank, cells indicate that a data observation was not reported.

*Ground Cover: 1=Grass; 2=Fallow; 3=Bare Ground; 4-Brome grass; 5=Sod; 6=Straw mulch; 7=Grass muck; 8=Bare muck; 0=Unknown

"S" This data value failed one of NCDC's quality control tests.

"T" values in the Precipitation or Snow category above indicate a "trace" value was recorded.

"A" Values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.

Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.

Record of Climatological Observations

These data are quality controlled and may not be identical to the original observations.

Generated on 08/13/2021

Year	Month	Day	Temperature (F)			Precipitation			Evaporation			8 in. Depth			Soil Temperature (F)		
			24 Hrs. Ending at Observation Time	At Obs.	24 Hour Amounts Ending at Observation Time	Rain, Melted Snow, Etc. (in)	F - Snow, Ice Pellets, Hail (in)	F - Snow, Ice Hail, Ice on Ground (in)	24 Hour Wind Movement (mi)	Amount of Evap. (in)	At Obs. Time	Snow, Ice Pellets, Hail, Ice on Ground (in)	Ground Cover (see *)	Max.	Min.	Max.	Min.
2017	06	01	71	59	0.10	0.0	0.0	0.0	0.0	0.0	0.0	0.0					
2017	06	02	75	57	0.00	0.0	0.0	0.0	0.0	0.0	0.0	0.0					
2017	06	03	66	56	0.00	0.0	0.0	0.0	0.0	0.0	0.0	0.0					
2017	06	04	68	53	0.00	0.0	0.0	0.0	0.0	0.0	0.0	0.0					
2017	06	05	78	44	0.00	0.0	0.0	0.0	0.0	0.0	0.0	0.0					
2017	06	06	86	52	0.00	0.0	0.0	0.0	0.0	0.0	0.0	0.0					
2017	06	07	78	54	0.01	0.0	0.0	0.0	0.0	0.0	0.0	0.0					
2017	06	08	67	56	0.27	0.0	0.0	0.0	0.0	0.0	0.0	0.0					
2017	06	09	63	52	0.21	0.0	0.0	0.0	0.0	0.0	0.0	0.0					
2017	06	10	62	51	0.09	0.0	0.0	0.0	0.0	0.0	0.0	0.0					
2017	06	11	71	53	T	0.0	0.0	0.0	0.0	0.0	0.0	0.0					
2017	06	12	61	51	T	0.0	0.0	0.0	0.0	0.0	0.0	0.0					
2017	06	13	63	52	T	0.0	0.0	0.0	0.0	0.0	0.0	0.0					
2017	06	14	66	48	T	0.0	0.0	0.0	0.0	0.0	0.0	0.0					
2017	06	15	64	56	0.50	0.0	0.0	0.0	0.0	0.0	0.0	0.0					
2017	06	16	65	58	0.06	0.0	0.0	0.0	0.0	0.0	0.0	0.0					
2017	06	17	70	56	T	0.0	0.0	0.0	0.0	0.0	0.0	0.0					
2017	06	18	79	59	0.00	0.0	0.0	0.0	0.0	0.0	0.0	0.0					
2017	06	19	88	60	0.00	0.0	0.0	0.0	0.0	0.0	0.0	0.0					
2017	06	20	79	55	0.00	0.0	0.0	0.0	0.0	0.0	0.0	0.0					
2017	06	21	75	51	0.00	0.0	0.0	0.0	0.0	0.0	0.0	0.0					
2017	06	22	85	52	0.00	0.0	0.0	0.0	0.0	0.0	0.0	0.0					
2017	06	23	90	54	0.00	0.0	0.0	0.0	0.0	0.0	0.0	0.0					
2017	06	24	99	55	0.00	0.0	0.0	0.0	0.0	0.0	0.0	0.0					
2017	06	25	101	60	0.00	0.0	0.0	0.0	0.0	0.0	0.0	0.0					
2017	06	26	78	59	T	0.0	0.0	0.0	0.0	0.0	0.0	0.0					
2017	06	27	76	58	0.00	0.0	0.0	0.0	0.0	0.0	0.0	0.0					
2017	06	28	72	56	0.00	0.0	0.0	0.0	0.0	0.0	0.0	0.0					
2017	06	29	83	55	0.00	0.0	0.0	0.0	0.0	0.0	0.0	0.0					
2017	06	30	86	59	0.00	0.0	0.0	0.0	0.0	0.0	0.0	0.0					
		Summary	76	55	1.24												

Empty, or blank, cells indicate that a data observation was not reported.

*Ground Cover: 1=Grass; 2=Fallow; 3=Bare Ground; 4=Brome grass; 5=Sod; 6=Straw mulch; 7=Grass muck; 8=Bare muck; 0=Unknown

"S" This data value failed one of NCDC's quality control tests.

"T" values in the Precipitation or Snow category above indicate a "trace" value was recorded.

"A" values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.

Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.

Record of Climatological Observations

These data are quality controlled and may not be identical to the original observations.

Generated on 08/13/2021

National Centers for Environmental Information
151 Patton Avenue
Asheville, North Carolina 28801
Observation Time Temperature: Unknown Observation Time Precipitation: Unknown

Year	Month	Day	Temperature (F)			Precipitation			Evaporation			8 in. Depth			Soil Temperature (F)		
			24 Hrs. Ending at Observation Time	At Obs.	24 Hour Amounts Ending at Observation Time	Rain, Melted Snow, Etc. (in)	F - Snow, Ice Pellets, Hail (in)	F - Snow, Ice Pellets, Hail (in)	24 Hour Wind Movement (mi)	Amount of Evap. (in)	At Obs. Time	Snow, Ice Pellets, Hail, Ice on Ground (in)	Ground Cover (see *)	Max.	Min.	Ground Cover (see *)	Max.
2017	07	01	76	57	0.00	0.00	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
2017	07	02	82	55	0.00	0.00	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
2017	07	03	78	58	0.00	0.00	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
2017	07	04	84	56	0.00	0.00	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
2017	07	05	91	56	0.00	0.00	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
2017	07	06	89	56	0.00	0.00	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
2017	07	07	73	57	0.00	0.00	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
2017	07	08	86	50	0.00	0.00	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
2017	07	09	83	54	0.00	0.00	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
2017	07	10	78	56	0.00	0.00	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
2017	07	11	79	52	0.00	0.00	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
2017	07	12	82	56	0.00	0.00	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
2017	07	13	76	56	0.00	0.00	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
2017	07	14	86	55	0.00	0.00	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
2017	07	15	80	56	0.00	0.00	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
2017	07	16	74	53	0.00	0.00	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
2017	07	17	81	54	0.00	0.00	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
2017	07	18	85	54	0.00	0.00	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
2017	07	19	82	52	0.00	0.00	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
2017	07	20	75	58	T	0.00	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
2017	07	21	82	55	0.00	0.00	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
2017	07	22	91	60	0.00	0.00	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
2017	07	23	83	63	0.00	0.00	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
2017	07	24	87	58	0.00	0.00	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
2017	07	25	89	61	0.00	0.00	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
2017	07	26	86	59	0.00	0.00	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
2017	07	27	79	60	0.00	0.00	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
2017	07	28	82	56	0.00	0.00	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
2017	07	29	86	54	0.00	0.00	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
2017	07	30	87	61	0.00	0.00	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
2017	07	31	91	60	0.00	0.00	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
		Summary	83	56	0.00	0.00	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0

Empty, or blank, cells indicate that a data observation was not reported.

*Ground Cover: 1=Grass; 2=Fallow; 3=Bare Ground; 4-Brome grass; 5=Sod; 6=Straw mulch; 7=Grass muck; 8=Bare muck; 0=Unknown

"S" This data value failed one of NCDC's quality control tests.

"T" values in the Precipitation or Snow category above indicate a "trace" value was recorded.

"A" Values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.

Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.

"At Obs." = Temperature at time of observation

"T" values in the Precipitation or Snow category above indicate a "trace" value was recorded.

"A" Values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.

.

Record of Climatological Observations

These data are quality controlled and may not be identical to the original observations.

Generated on 08/13/2021

Observation Time Temperature: Unknown Observation Time Precipitation: Unknown

Case 3:21-cv-05784 Document 1 Filed 10/21/21 Page 44 of 91

At Obs. Time

24 Hour Wind Movement (mi)

Amount of Evap. (in)

Ground Cover (see *)

Max.

Min.

Ground Cover (see *)

Max.

Record of Climatological Observations

These data are quality controlled and may not be identical to the original observations.

Generated on 08/13/2021

Observation Time Temperature: Unknown Observation Time Precipitation: Unknown

Case 3:21-cv-05784 Document 1 Filed 10/21/21 Page 45 of 91

Year	Month	Day	Temperature (F)		Precipitation			Evaporation			8 in. Depth			Soil Temperature (F)		
			24 Hrs. Ending at Observation Time	At Obs.	Rain, Melted Snow, Etc. (in)	F- Snow, Ice Pellets, Hail (in)	F- Snow, Ice Pellets, Hail (in)	24 Hour Wind Movement (mi)	Amount of Evap. (in)	Ground Cover (see *)	Max.	Min.	Ground Cover (see *)	Max.	Min.	
2017	10	01	65	47	0.01											
2017	10	02	66	47	0.13						0.0					
2017	10	03	71	40	0.00						0.0					
2017	10	04	72	39	0.00						0.0					
2017	10	05	74	40	0.00						0.0					
2017	10	06	72	41	0.00						0.0					
2017	10	07	64	51	0.02						0.0					
2017	10	08	65	43	0.02						0.0					
2017	10	09	67	37	0.00						0.0					
2017	10	10	55	41	0.04						0.0					
2017	10	11	56	44	0.22						0.0					
2017	10	12	56	45	0.51						0.0					
2017	10	13	59	39	T						0.0					
2017	10	14	59	37	0.00						0.0					
2017	10	15	65	36	0.00						0.0					
2017	10	16	67	38	0.00						0.0					
2017	10	17	58	41	0.05						0.0					
2017	10	18	65	49	0.07						0.0					
2017	10	19	60	50	0.94						0.0					
2017	10	20	54	48	0.17						0.0					
2017	10	21	61	47	1.91						0.0					
2017	10	22	62	46	0.46						0.0					
2017	10	23	65	46	0.00						0.0					
2017	10	24	70	40	0.00						0.0					
2017	10	25	61	44	0.00						0.0					
2017	10	26	72	49	0.00						0.0					
2017	10	27	74	41	0.00						0.0					
2017	10	28	70	40	0.00						0.0					
2017	10	29	59	45	0.00						0.0					
2017	10	30	63	37	0.00						0.0					
2017	10	31	63	32	0.00						0.0					
		Summary	64	43	4.55						0.0					

Empty, or blank, cells indicate that a data observation was not reported.

*Ground Cover: 1=Grass; 2=Fallow; 3=Bare Ground; 4-Brome grass; 5=Sod; 6=Straw mulch; 7=Grass muck; 8=Bare muck; 0=Unknown

"S" This data value failed one of NCDC's quality control tests.

"T" = Temperature at time of observation

"A" values in the Precipitation or Snow category above indicate a "trace" value was recorded.

"A" values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.
Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.

Record of Climatological Observations

These data are quality controlled and may not be identical to the original observations.

Generated on 08/13/2021

Observation Time Temperature: Unknown Observation Time Precipitation: Unknown

Case 3:21-cv-05784 Document 1 Filed 10/21/21 Page 46 of 91

Year	Month	Day	Temperature (F)			Precipitation			Evaporation			8 in. Depth			Soil Temperature (F)		
			24 Hrs. Ending at Observation Time	At Obs.	24 Hour Amounts Ending at Observation Time	Rain, Melted Snow, Etc. (in)	F- Snow, Ice Pellets, Hail (in)	F- Snow, Ice Pellets, Hail (in)	At Obs. Time	24 Hour Wind Movement (mi)	Amount of Evap. (in)	Ground Cover (see *)	Max.	Min.	Ground Cover (see *)	Max.	Min.
2017	11	01	58	43	T												
2017	11	02	55	45	0.12												
2017	11	03	50	42	T						0.0						
2017	11	04	48	39	0.08						0.0						
2017	11	05	50	35	0.10						0.0						
2017	11	06	50	35	0.00						0.0						
2017	11	07	48	42	0.00						0.0						
2017	11	08	49	42	0.35						0.0						
2017	11	09	55	40	0.25						0.0						
2017	11	10	51	39	0.39						0.0						
2017	11	11	51	40	0.08												
2017	11	12	54	49	0.18						0.0						
2017	11	13	56	47	0.35						0.0						
2017	11	14	58	47	0.01						0.0						
2017	11	15	56	44	0.90						0.0						
2017	11	16	49	43	0.21						0.0						
2017	11	17	52	42	0.13						0.0						
2017	11	18	52	35	0.00						0.0						
2017	11	19	51	36	0.21						0.0						
2017	11	20	57	41	0.83						0.0						
2017	11	21	52	45	0.65						0.0						
2017	11	22	62	49	0.26						0.0						
2017	11	23	63	45	0.20						0.0						
2017	11	24	56	43	T						0.0						
2017	11	25	50	37	0.12												
2017	11	26	55	44	0.48						0.0						
2017	11	27	51	41	0.00												
2017	11	28	46	43	0.48												
2017	11	29	52	36	0.00												
2017	11	30	47	36	0.12												
		Summary	53	42	6.50												

Empty, or blank, cells indicate that a data observation was not reported.

*Ground Cover: 1=Grass; 2=Fallow; 3=Bare Ground; 4=Brome grass; 5=Sod; 6=Straw mulch; 7=Grass muck; 8=Bare muck; 0=Unknown

"S" This data value failed one of NCDC's quality control tests.

"T" values in the Precipitation or Snow category above indicate a "trace" value was recorded.

"A" values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.

Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.

Record of Climatological Observations

These data are quality controlled and may not be identical to the original observations.

Generated on 08/13/2021

Year	Month	Day	Temperature (F)			Precipitation			Evaporation			8 in. Depth			Soil Temperature (F)		
			24 Hrs. Ending at Observation Time	At Obs.	24 Hour Amounts Ending at Observation Time	Rain, Melted Snow, Etc. (in)	F - Snow, Ice Pellets, Hail (in)	F - Snow, Ice Pellets, Hail (in)	24 Hour Wind Movement (mi)	Amount of Evap. (in)	Ground Cover (see *)	Max.	Min.	Ground Cover (see *)	Max.	Min.	Min.
2017	12	01	50	45	0.02												
2017	12	02	49	44	0.29												
2017	12	03	47	35	0.07				T								
2017	12	04	45	35													
2017	12	05	50	31	0.00												
2017	12	06	55	31	0.00												
2017	12	07	52	28	0.00												
2017	12	08	45	27	0.00												
2017	12	09	46	24	0.00												
2017	12	10	46	23	0.00												
2017	12	11	45	23	0.00												
2017	12	12	45	22					T								
2017	12	13	45	26	0.00												
2017	12	14	44	26	0.00												
2017	12	15	40	28	0.01												
2017	12	16	45	34	0.02												
2017	12	17	49	42	0.00												
2017	12	18	53	47	0.01												
2017	12	19	53	40	0.66												
2017	12	20	46	27	0.03												
2017	12	21	36	24	0.00												
2017	12	22	40	34	0.38												
2017	12	23	41	30	0.17												
2017	12	24	34	29	0.21												
2017	12	25	33	29	0.08												
2017	12	26	35	25	0.02												
2017	12	27	37	32	0.01												
2017	12	28	53	37	0.64												
2017	12	29	56	48	0.52												
2017	12	30	52	32	0.00												
2017	12	31	50	28	0.00												
		Summary	46	32	3.14												

Empty, or blank, cells indicate that a data observation was not reported.

*Ground Cover: 1=Grass; 2=Fallow; 3=Bare Ground; 4=Straw mulch; 5=Brome grass; 6=Sod; 7=Grass muck; 8=Bare muck; 0=Unknown

"S" This data value failed one of NCDC's quality control tests.

"T" "At Obs." = Temperature at time of observation

"T" values in the Precipitation or Snow category above indicate a "trace" value was recorded.

"A" Values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.

Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.

Case 3:21-cv-05784 Document 1 Filed 10/21/21 Page 47 of 91

Record of Climatological Observations

These data are quality controlled and may not be identical to the original observations.

Generated on 08/13/2021

Observation Time Temperature: Unknown Observation Time Precipitation: Unknown

Case 3:21-cv-05784 Document 1 Filed 10/21/21 Page 48 of 91

Year	Month	Day	Temperature (F)		Precipitation			Evaporation			8 in. Depth			Soil Temperature (F)		
			24 Hrs. Ending at Observation Time	At Obs.	Rain, Melted Snow, Etc. (in)	F - Snow, Ice Pellets, Hail (in)	F - Snow, Ice Pellets, Hail (in)	24 Hour Wind Movement (mi)	Amount of Evap. (in)	Ground Cover (see *)	Max.	Min.	Ground Cover (see *)	Max.	Min.	
2018	01	01	44	28	0.00	0.0	0.0									
2018	01	02	44	27	0.00	0.0	0.0									
2018	01	03	47	31	0.00	0.0	0.0									
2018	01	04	46	34	0.04	0.04	0.04									
2018	01	05	52	39	0.28	0.28	0.28									
2018	01	06	50	35	0.02	0.02	0.02									
2018	01	07	45	39	0.16	0.16	0.16									
2018	01	08	45	35	0.08	0.08	0.08									
2018	01	09	49	40	0.46	0.46	0.46									
2018	01	10	47	42	0.05	0.05	0.05									
2018	01	11	58	46	0.71	0.71	0.71									
2018	01	12	53	48	0.14	0.14	0.14									
2018	01	13	58	38	0.00	0.00	0.00									
2018	01	14	57	34	0.00	0.00	0.00									
2018	01	15	57	35	0.08	0.08	0.08									
2018	01	16	56	40	0.05	0.05	0.05									
2018	01	17	52	40	0.51	0.51	0.51									
2018	01	18	52	42	0.16	0.16	0.16									
2018	01	19	48	41	0.04	0.04	0.04									
2018	01	20	49	43	T	T	T									
2018	01	21	51	43	0.17	0.17	0.17									
2018	01	22	49	42	0.19	0.19	0.19									
2018	01	23	48	41	0.70	0.70	0.70									
2018	01	24	52	42	0.63	0.63	0.63									
2018	01	25	47	39	0.28	0.28	0.28									
2018	01	26	48	41	0.21	0.21	0.21									
2018	01	27	53	42	0.22	0.22	0.22									
2018	01	28	56	48	T	T	T									
2018	01	29	54	46	0.40	0.40	0.40									
2018	01	30	50	35	0.01	0.01	0.01									
2018	01	31	48	38	T	T	T									
		Summary	50	39	5.59	5.59	5.59									

Empty, or blank, cells indicate that a data observation was not reported.

*Ground Cover: 1=Grass; 2=Fallow; 3=Bare Ground; 4-Brome grass; 5=Sod; 6=Straw mulch; 7=Grass muck; 8=Bare muck; 0=Unknown

"S" This data value failed one of NCDC's quality control tests.

"T" values in the Precipitation or Snow category above indicate a "trace" value was recorded.

"A" Values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.

Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.

Record of Climatological Observations

These data are quality controlled and may not be identical to the original observations.

Generated on 08/13/2021

Observation Time Temperature: Unknown Observation Time Precipitation: Unknown

Case 3:21-cv-05784 Document 1 Filed 10/21/21 Page 49 of 91

Y e a r	M o n t h	D a y	Temperature (F)			Precipitation			Evaporation			8 in. Depth			Soil Temperature (F)		
			24 Hrs. Ending at Observation Time	At Obs.	24 Hour Amounts Ending at Observation Time	Rain, Melted Snow, Etc. (in)	F - Snow, Ice Pellets, Hail (in)	F - Snow, Ice Pellets, Hail (in)	24 Hour Wind Movement (mi)	Amount of Evap. (in)	Ground Cover (see *)	Max.	Min.	Ground Cover (see *)	Max.	Min.	Min.
2018	02	01	51	41	0.12	T											
2018	02	02	60	43													
2018	02	03	57	45	0.02												
2018	02	04	60	45	0.00												
2018	02	05	58	38	0.00												
2018	02	06	52	35	0.00												
2018	02	07	59	36	0.00												
2018	02	08	55	37	0.00												
2018	02	09	51	37	T												
2018	02	10	50	32	0.00												
2018	02	11	49	34	T												
2018	02	12	49	28	0.00												
2018	02	13	51	23	T												
2018	02	14	47	33	0.32												
2018	02	15	49	38	0.07												
2018	02	16	50	42	0.07												
2018	02	17	56	42	0.07												
2018	02	18	43	32	0.17												
2018	02	19	40	28	0.01												
2018	02	20	34	31	0.25												
2018	02	21	36	20	0.03												
2018	02	22	39	29	0.04												
2018	02	23	39	22	T												
2018	02	24	49	37	0.04												
2018	02	25	46	33	0.18												
2018	02	26	44	31	0.00												
2018	02	27	46	35	0.06												
2018	02	28	46	41	0.32												
		Summary	49	35	1.77												

Empty, or blank, cells indicate that a data observation was not reported.

*Ground Cover: 1=Grass; 2=Fallow; 3=Bare Ground; 4=Brome grass; 5=Sod; 6=Straw mulch; 7=Grass mulch; 8=Bare mulch; 0=Unknown

"s" This data value failed one of NCDC's quality control tests.

"At Obs." = Temperature at time of observation

"T" values in the Precipitation or Snow category above indicate a "trace" value was recorded.

"A" values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.

Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.

Record of Climatological Observations

These data are quality controlled and may not be identical to the original observations.

Generated on 08/13/2021

Observation Time Temperature: Unknown Observation Time Precipitation: Unknown

Case 3:21-cv-05784 Document 1 Filed 10/21/21 Page 50 of 91

Year	Month	Day	Temperature (F)		Precipitation			Evaporation			8 in. Depth			Soil Temperature (F)		
			24 Hrs. Ending at Observation Time	At Obs.	Rain, Melted Snow, Etc. (in)	F- Snow, Ice Pellets, Hail (in)	F- Snow, Ice Pellets, Hail (in)	24 Hour Wind Movement (mi)	Amount of Evap. (in)	At Obs. Time	Snow, Ice Pellets, Hail, Ice on Ground (in)	Ground Cover (see *)	Max.	Min.	Ground Cover (see *)	Max.
2018	03	01	49	39	0.06				0.0							
2018	03	02	50	37	T				0.0							
2018	03	03	51	32	0.00				0.0							
2018	03	04	51	31	T				0.0							
2018	03	05	51	32	0.06				0.0							
2018	03	06	59	28	0.00				0.0							
2018	03	07	54	31	0.00				0.0							
2018	03	08	58	38	0.22				0.0							
2018	03	09	54	35	0.00				0.0							
2018	03	10	64	30	0.00				0.0							
2018	03	11	66	37	0.00				0.0							
2018	03	12	70	36	0.00				0.0							
2018	03	13	62	46	0.38				0.0							
2018	03	14	54	39	0.05				0.0							
2018	03	15	55	37	0.26				0.0							
2018	03	16	53	39	0.07											
2018	03	17	52	40	0.46											
2018	03	18	53	36	0.01											
2018	03	19	57	33	0.00											
2018	03	20	62	31	0.00											
2018	03	21	53	34	0.19											
2018	03	22	50	40	0.34											
2018	03	23	46	38	0.54											
2018	03	24	45	37	0.15											
2018	03	25	53	39	0.08											
2018	03	26	50	40	0.02											
2018	03	27	57	47	0.04											
2018	03	28	57	41	0.00											
2018	03	29	61	34	0.00											
2018	03	30	57	45	0.00											
2018	03	31	64	44	0.00											
		Summary	55	37	2.93											

Empty, or blank, cells indicate that a data observation was not reported.

*Ground Cover: 1=Grass; 2=Fallow; 3=Bare Ground; 4-Brome grass; 5=Sod; 6=Straw mulch; 7=Grass muck; 8=Bare muck; 0=Unknown

"S" This data value failed one of NCDC's quality control tests.

"T" values in the Precipitation or Snow category above indicate a "trace" value was recorded.

"A" Values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.

Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.

Record of Climatological Observations

These data are quality controlled and may not be identical to the original observations.

Generated on 08/13/2021

Observation Time Temperature: Unknown Observation Time Precipitation: Unknown

Case 3:21-cv-05784 Document 1 Filed 10/21/21 Page 51 of 91

Year	Month	Day	Temperature (F)		Precipitation			Evaporation			8 in. Depth			Soil Temperature (F)		
			24 Hrs. Ending at Observation Time	At Obs.	Rain, Melted Snow, Etc. (in)	F - Snow, Ice Pellets, Hail (in)	F - Snow, Ice Pellets, Hail (in)	24 Hour Wind Movement (mi)	Amount of Evap. (in)	Ground Cover (see *)	Max.	Min.	Ground Cover (see *)	Max.	Min.	
2018	04	01	49	34	0.31	0.0	0.0	0.0	0.0							
2018	04	02	53	34	0.00	0.0	0.0	T	0.0		0.0	0.0				
2018	04	03	53	31	0.03	0.03	0.03		0.0		0.0	0.0				
2018	04	04	59	46	0.32	0.32	0.32		0.0		0.0	0.0				
2018	04	05	54	49	0.06	0.06	0.06		0.0		0.0	0.0				
2018	04	06	67	51	1.09	1.09	1.09		0.0		0.0	0.0				
2018	04	07	60	49	0.27	0.27	0.27		0.0		0.0	0.0				
2018	04	08	55	47	0.00	0.00	0.00		0.0		0.0	0.0				
2018	04	09	66	38	0.11	0.11	0.11		0.0		0.0	0.0				
2018	04	10	62	50	0.14	0.14	0.14		0.0		0.0	0.0				
2018	04	11	57	44	0.12	0.12	0.12		0.0		0.0	0.0				
2018	04	12	51	42	0.03	0.03	0.03		0.0		0.0	0.0				
2018	04	13	56	47	0.00	0.00	0.00		0.0		0.0	0.0				
2018	04	14	59	50	0.00	0.00	0.00		0.0		0.0	0.0				
2018	04	15	50	43	0.00	0.00	0.00		0.0		0.0	0.0				
2018	04	16	50	42	0.00	0.00	0.00		0.0		0.0	0.0				
2018	04	17	55	43	0.00	0.00	0.00		0.0		0.0	0.0				
2018	04	18	64	41	0.00	0.00	0.00		0.0		0.0	0.0				
2018	04	19	68	36	0.00	0.00	0.00		0.0		0.0	0.0				
2018	04	20	67	39	0.00	0.00	0.00		0.0		0.0	0.0				
2018	04	21	62	47	0.00	0.00	0.00		0.0		0.0	0.0				
2018	04	22	65	41	0.00	0.00	0.00		0.0		0.0	0.0				
2018	04	23	73	38	0.00	0.00	0.00		0.0		0.0	0.0				
2018	04	24	81	46	0.00	0.00	0.00		0.0		0.0	0.0				
2018	04	25	84	48	0.00	0.00	0.00		0.0		0.0	0.0				
2018	04	26	85	48	0.00	0.00	0.00		0.0		0.0	0.0				
2018	04	27	57	50	0.02	0.02	0.02		0.0		0.0	0.0				
2018	04	28	61	47	0.08	0.08	0.08		0.0		0.0	0.0				
2018	04	29	60	47	0.06	0.06	0.06		0.0		0.0	0.0				
2018	04	30	59	48	0.01	0.01	0.01		0.0		0.0	0.0				
		Summary	61	44	3.32	3.32	0.0									

Empty, or blank, cells indicate that a data observation was not reported.

*Ground Cover: 1=Grass; 2=Fallow; 3=Bare Ground; 4=Brome grass; 5=Sod; 6=Straw mulch; 7=Grass muck; 8=Bare muck; 0=Unknown

"S" This data value failed one of NCDC's quality control tests.

"T" values in the Precipitation or Snow category above indicate a "trace" value was recorded.

"A" values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.

Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.

Record of Climatological Observations

These data are quality controlled and may not be identical to the original observations.

Generated on 08/13/2021

National Centers for Environmental Information
151 Patton Avenue
Asheville, North Carolina 28801
Observation Time Temperature: Unknown Observation Time Precipitation: Unknown

Year	Month	Day	Temperature (F)			Precipitation			Evaporation			Soil Temperature (F)		
			24 Hrs. Ending at Observation Time	At Obs.	24 Hour Amounts Ending at Observation Time	Rain, Melted Snow, Etc. (in)	F - Snow, Ice Pellets, Hail (in)	F - Snow, Ice Pellets, Hail (in)	24 Hour Wind Movement (mi)	Amount of Evap. (in)	Ground Cover (see *)	Max.	Min.	Ground Cover (see *)
2018	06	01	70	49	0.00	0.00	0.0	0.0	0.0	0.0				
2018	06	02	82	49	0.00	0.00	0.0	0.0	0.0	0.0				
2018	06	03	71	54	T	0.0	0.0	0.0	0.0	0.0				
2018	06	04	68	51	T	0.0	0.0	0.0	0.0	0.0				
2018	06	05	73	43	0.00	0.00	0.0	0.0	0.0	0.0				
2018	06	06	78	48	0.00	0.00	0.0	0.0	0.0	0.0				
2018	06	07	70	57	0.00	0.00	0.0	0.0	0.0	0.0				
2018	06	08	69	56	0.17	0.0	0.0	0.0	0.0	0.0				
2018	06	09	63	50	0.41	0.0	0.0	0.0	0.0	0.0				
2018	06	10	57	50	0.15	0.0	0.0	0.0	0.0	0.0				
2018	06	11	72	44	T	0.0	0.0	0.0	0.0	0.0				
2018	06	12	79	43	0.00									
2018	06	13	68	55	T									
2018	06	14	67	53	0.00									
2018	06	15	72	55	0.00									
2018	06	16	77	57	0.04									
2018	06	17	90	52	0.06									
2018	06	18	82	55	0.00									
2018	06	19	90	55	0.00									
2018	06	20	94	61	0.00									
2018	06	21	71	61	0.00									
2018	06	22	76	60	T									
2018	06	23	76	56	T									
2018	06	24	90	53	T									
2018	06	25	72	58	0.03									
2018	06	26	75	48	0.00									
2018	06	27	77	55	T									
2018	06	28	73	56	0.00									
2018	06	29	79	52	0.00									
2018	06	30	77	56	0.00									
		Summary	75	53	0.86									

Empty, or blank, cells indicate that a data observation was not reported.

*Ground Cover: 1=Grass; 2=Fallow; 3=Bare Ground; 4=Brome grass; 5=Sod; 6=Straw mulch; 7=Grass muck; 8=Bare muck; 0=Unknown

"S" This data value failed one of NCDC's quality control tests.

"T" values in the Precipitation or Snow category above indicate a "trace" value was recorded.

"A" values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.

Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.

Record of Climatological Observations

These data are quality controlled and may not be identical to the original observations.

Generated on 08/13/2021

Year	Month	Day	Temperature (F)		Precipitation			Evaporation			Soil Temperature (F)		
			24 Hrs. Ending at Observation Time	At Obs.	24 Hour Amounts Ending at Observation Time	At Obs. Time	24 Hour Wind Movement (mi)	Amount of Evap. (in)	Ground Cover (see *)	Max.	Min.	Ground Cover (see *)	Max.
2018	07	01	76	58	0.00	0.0	0.0	0.0					
2018	07	02	71	54	0.02	0.0	0.0	0.0					
2018	07	03	78	48	0.00	0.0	0.0	0.0					
2018	07	04	83	57	0.00	0.0	0.0	0.0					
2018	07	05	87	55	0.00	0.0	0.0	0.0					
2018	07	06	81	57	0.00	0.0	0.0	0.0					
2018	07	07	79	62	0.00	0.0	0.0	0.0					
2018	07	08	86	55	0.00	0.0	0.0	0.0					
2018	07	09	71	57	T								
2018	07	10	78	59	0.00								
2018	07	11	88	59	0.00								
2018	07	12	95	66	0.00								
2018	07	13	91	63	0.00								
2018	07	14	92	57	0.00								
2018	07	15	99	61	0.00								
2018	07	16	96	62	0.00								
2018	07	17	90	60	0.00								
2018	07	18	82	59	0.00								
2018	07	19	71	57	0.00								
2018	07	20	78	48	0.00								
2018	07	21	80	54	0.00								
2018	07	22	94	55	0.00								
2018	07	23	94	59	0.00								
2018	07	24	94	59	0.00								
2018	07	25	96	59	0.00								
2018	07	26	95	60	0.00								
2018	07	27	90	59	0.00								
2018	07	28	89	59	0.00								
2018	07	29	98	62	0.00								
2018	07	30	91	65	0.00								
2018	07	31	88	62	0.00								
		Summary	86	58	0.02								

Empty, or blank, cells indicate that a data observation was not reported.

*Ground Cover: 1=Grass; 2=Fallow; 3=Bare Ground; 4-Brome grass; 5=Sod; 6=Straw mulch; 7=Grass muck; 8=Bare muck; 0=Unknown

"S" This data value failed one of NCDC's quality control tests.

"T" values in the Precipitation or Snow category above indicate a "trace" value was recorded.

"A" values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.

Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.
Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.

Record of Climatological Observations

These data are quality controlled and may not be identical to the original observations.

Generated on 08/13/2021

National Centers for Environmental Information
151 Patton Avenue
Asheville, North Carolina 28801
Observation Time Temperature: Unknown Observation Time Precipitation: Unknown

Case 3:21-cv-05784 Document 1 Filed 10/21/21 Page 56 of 91

Year	Month	Day	Temperature (F)			Precipitation			Evaporation			8 in. Depth			Soil Temperature (F)		
			24 Hrs. Ending at Observation Time	At Obs.	24 Hour Amounts Ending at Observation Time	Rain, Melted Snow, Etc. (in)	Snow, Ice Pellets, Hail (in)	Fog	24 Hour Wind Movement (mi)	Amount of Evap. (in)	Ground Cover (see *)	Max.	Min.	Ground Cover (see *)	Max.	Min.	Min.
2018	09	01	75	50	0.00												
2018	09	02	81	49	0.00												
2018	09	03	78	55	0.00												
2018	09	04	83	50	0.00												
2018	09	05	91	52	0.00												
2018	09	06	87	53	0.00												
2018	09	07	84	51	0.00												
2018	09	08	76	60	0.00												
2018	09	09	79	55	0.00												
2018	09	10	72	55	0.09												
2018	09	11	68	53	0.09												
2018	09	12	70	52	0.41												
2018	09	13	70	52	0.38												
2018	09	14	71	54	0.00												
2018	09	15	66	52	0.01												
2018	09	16	69	52	0.21												
2018	09	17	69	47	0.00												
2018	09	18	72	45	0.00												
2018	09	19	71	45	0.00												
2018	09	20	72	48	0.00												
2018	09	21	75	48	T												
2018	09	22	72	49	0.01												
2018	09	23	68	48	0.00												
2018	09	24	73	43	0.00												
2018	09	25	80	44	0.00												
2018	09	26	82	48	0.00												
2018	09	27	84	50	0.00												
2018	09	28	86	50	0.00												
2018	09	29	66	53	0.02												
2018	09	30	69	51	T												
		Summary	75	50	1.22												

Empty, or blank, cells indicate that a data observation was not reported.

*Ground Cover: 1=Grass; 2=Fallow; 3=Bare Ground; 4=Brome grass; 5=Sod; 6=Straw mulch; 7=Grass mulch; 8=Bare mulch; 0=Unknown

"S" This data value failed one of NCDC's quality control tests.

"T" values in the Precipitation or Snow category above indicate a "trace" value was recorded.

"A" values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.

Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.

Record of Climatological Observations

These data are quality controlled and may not be identical to the original observations.

Generated on 08/13/2021

Year	Month	Day	Temperature (F)			Precipitation			Evaporation			8 in. Depth			Soil Temperature (F)		
			24 Hrs. Ending at Observation Time	At Obs.	24 Hour Amounts Ending at Observation Time	Rain, Melted Snow, Etc. (in)	Snow, Ice Pellets, Hail (in)	Fog	24 Hour Wind Movement (mi)	Amount of Evap. (in)	Ground Cover (see *)	Max.	Min.	Ground Cover (see *)	Max.	Min.	Min.
2018	10	01	72	57	T												
2018	10	02	72	53	T												
2018	10	03	66	39	0.00												
2018	10	04	64	43	0.00												
2018	10	05	54	42	0.51												
2018	10	06	63	45	0.01												
2018	10	07	55	43	0.11												
2018	10	08	61	52	0.19												
2018	10	09	65	49	0.0												
2018	10	10	68	45	0.0												
2018	10	11	70	41	0.0												
2018	10	12	71	41	0.0												
2018	10	13	71	42	0.0												
2018	10	14	70	38	0.0												
2018	10	15	73	35	0.0												
2018	10	16	77	40	0.0												
2018	10	17	74	36	0.0												
2018	10	18	69	38	0.0												
2018	10	19	69	41	0.0												
2018	10	20	66	40	0.0												
2018	10	21	69	39	0.0												
2018	10	22	69	40	0.0												
2018	10	23	60	42	0.05												
2018	10	24	61	53	0.0												
2018	10	25	59	54	0.33												
2018	10	26	63	55	0.42												
2018	10	27	65	54	1.33												
2018	10	28	62	52	0.16												
2018	10	29	57	44	0.05												
2018	10	30	55	49	0.10												
2018	10	31	59	50	0.12												
		Summary	65	45	3.38												

Empty, or blank, cells indicate that a data observation was not reported.

*Ground Cover: 1=Grass; 2=Fallow; 3=Bare Ground; 4-Brome grass; 5=Sod; 6=Straw mulch; 7=Grass muck; 8=Bare muck; 0=Unknown

"S" This data value failed one of NCDC's quality control tests.

"T" At Obs." = Temperature at time of observation

"T" values in the Precipitation or Snow category above indicate a "trace" value was recorded.

"A" Values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.

Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.

Generated on 08/13/2021

Record of Climatological Observations

These data are quality controlled and may not be identical to the original observations.

Generated on 08/13/2021

Observation Time Temperature: Unknown Observation Time Precipitation: Unknown

Case 3:21-cv-05784 Document 1 Filed 10/21/21 Page 58 of 91

Year	Month	Day	Temperature (F)		Precipitation			Evaporation			8 in. Depth			Soil Temperature (F)			
			24 Hrs. Ending at Observation Time	At Obs.	24 Hour Amounts Ending at Observation Time	At Obs.	Rain, Melted Snow, Etc. (in)	Snow, Ice Pellets, Hail (in)	Fog	24 Hour Wind Movement (mi)	Amount of Evap. (in)	Ground Cover (see *)	Max.	Min.	Ground Cover (see *)	Max.	Min.
2018	11	01	67	58	0.01												
2018	11	02	65	51	0.12												
2018	11	03	59	50	0.02												
2018	11	04	64	46	0.15												
2018	11	05	58	47	0.01												
2018	11	06	57	41	0.02												
2018	11	07	51	34	0.00												
2018	11	08	54	32	0.00												
2018	11	09	51	30	0.00												
2018	11	10	53	33	0.00												
2018	11	11	58	27	0.00												
2018	11	12	51	39	0.00												
2018	11	13	47	33	0.00												
2018	11	14	52	33	0.02												
2018	11	15	55	42	0.00												
2018	11	16	55	39	0.00												
2018	11	17	58	36	0.00												
2018	11	18	55	30	0.00												
2018	11	19	56	29	0.00												
2018	11	20	53	28	0.00												
2018	11	21	47	42	0.07												
2018	11	22	51	43	0.63												
2018	11	23	50	38	0.41												
2018	11	24	46	33	0.00												
2018	11	25	49	35	0.00												
2018	11	26	51	44	0.19												
2018	11	27	61	47	0.49												
2018	11	28	51	46	0.23												
2018	11	29	52	40	0.00												
2018	11	30	51	41													
		Summary	54	39	2.37												

Empty, or blank, cells indicate that a data observation was not reported.

*Ground Cover: 1=Grass; 2=Fallow; 3=Bare Ground; 4=Brome grass; 5=Sod; 6=Straw mulch; 7=Grass muck; 8=Bare muck; 0=Unknown

"S" This data value failed one of NCDC's quality control tests.

"T" values in the Precipitation or Snow category above indicate a "trace" value was recorded.

"A" values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.

Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.

Record of Climatological Observations

These data are quality controlled and may not be identical to the original observations.

Generated on 08/13/2021

Year	Month	Day	Temperature (F)		Precipitation			Evaporation			8 in. Depth			Soil Temperature (F)		
			24 Hrs. Ending at Observation Time	At Obs.	24 Hour Amounts Ending at Observation Time	Rain, Melted Snow, Etc. (in)	F Snow, Ice Pellets, Hail (in)	F Snow, Ice Pellets, Hail (in)	24 Hour Wind Movement (mi)	Amount of Evap. (in)	Ground Cover (see *)	Max.	Min.	Ground Cover (see *)	Max.	Min.
2018	12	01	46	41	0.04											
2018	12	02	49	37	0.00											
2018	12	03	48	32	0.00											
2018	12	04	48	27	0.00											
2018	12	05	26	26	0.00											
2018	12	06	45	30	0.00											
2018	12	07	42	23	T											
2018	12	08	43	36	0.01											
2018	12	09	43	37	0.50											
2018	12	10	43	37	0.01											
2018	12	11	52	41	0.52											
2018	12	12	51	39	0.07	0.0										
2018	12	13	55	43	0.00											
2018	12	14	55	37	0.01											
2018	12	15	51	41	0.05											
2018	12	16	52	44	0.38											
2018	12	17	52	44	0.49											
2018	12	18	58	46	0.83											
2018	12	19	54	45	T											
2018	12	20	56	39	0.11											
2018	12	21	47	30	0.00											
2018	12	22	45	36	0.46											
2018	12	23	51	41	0.45											
2018	12	24	47	35	T											
2018	12	25	44	31	0.00											
2018	12	26	46	36	0.26											
2018	12	27	49	34	0.01											
2018	12	28	47	42	0.27											
2018	12	29	53	46	0.40											
2018	12	30	48	32	0.04											
2018	12	31	45	28	0.00											
		Summary	49	37	4.91											

Empty, or blank, cells indicate that a data observation was not reported.

*Ground Cover: 1=Grass; 2=Fallow; 3=Bare Ground; 4-Brome grass; 5=Sod; 6=Straw mulch; 7=Grass muck; 8=Bare muck; 0=Unknown

"S" This data value failed one of NCDC's quality control tests.

"T" At Obs." = Temperature at time of observation

"T" values in the Precipitation or Snow category above indicate a "trace" value was recorded.

"A" Values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.

Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.

Case 3:21-cv-05784 Document 1 Filed 10/21/21 Page 59 of 91

Record of Climatological Observations

These data are quality controlled and may not be identical to the original observations.

Generated on 08/13/2021

Year	Month	Day	Temperature (F)		Precipitation			Evaporation			8 in. Depth			Soil Temperature (F)			
			24 Hrs. Ending at Observation Time	At Obs.	24 Hour Amounts Ending at Observation Time	Rain, Melted Snow, Etc. (in)	Snow, Ice Pellets, Hail (in)	Fog	At Obs. Time	24 Hour Wind Movement (mi)	Amount of Evap. (in)	Ground Cover (see *)	Max.	Min.	Ground Cover (see *)	Max.	Min.
2019	01	01	40	27	0.00												
2019	01	02	45	30	0.00												
2019	01	03	55	43	0.05												
2019	01	04	52	41	0.03												
2019	01	05	48	36	0.06												
2019	01	06	52	36	0.23												
2019	01	07	45	34	T												
2019	01	08	49	40	0.24												
2019	01	09	46	42	0.28												
2019	01	10	49	36	0.01												
2019	01	11	50	32	0.00												
2019	01	12	53	29	0.00												
2019	01	13	53	27	0.00												
2019	01	14	47	26	0.00												
2019	01	15	43	26	0.00												
2019	01	16	48	28	0.16												
2019	01	17	54	36	0.04												
2019	01	18	47	41	1.03												
2019	01	19	51	42	0.03												
2019	01	20	45	40	0.39												
2019	01	21	49	33	0.02												
2019	01	22	50	41	0.24												
2019	01	23	56	44	0.02												
2019	01	24	51	34	0.00												
2019	01	25	49	33	0.00												
2019	01	26	44	31	0.00												
2019	01	27	41	34	0.00												
2019	01	28	54	34	0.00												
2019	01	29	52	27	0.00												
2019	01	30	50	27	0.00												
2019	01	31	50	27	0.00												
		Summary	49	34	2.83												

Empty, or blank, cells indicate that a data observation was not reported.

*Ground Cover: 1=Grass; 2=Fallow; 3=Bare Ground; 4=Brome grass; 5=Sod; 6=Straw mulch; 7=Grass muck; 8=Bare muck; 0=Unknown

"S" This data value failed one of NCDC's quality control tests.

"T" values in the Precipitation or Snow category above indicate a "trace" value was recorded.

"A" Values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.

Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.
Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.

Record of Climatological Observations

These data are quality controlled and may not be identical to the original observations.

Generated on 08/13/2021

Observation Time Temperature: Unknown Observation Time Precipitation: Unknown

Case 3:21-cv-05784 Document 1 Filed 10/21/21 Page 62 of 91

Year	Month	Day	Temperature (F)		Precipitation			Evaporation			8 in. Depth			Soil Temperature (F)			
			24 Hrs. Ending at Observation Time	At Obs.	24 Hour Amounts Ending at Observation Time	At Obs.	Rain, Melted Snow, Etc. (in)	Snow, Ice Pellets, Hail (in)	Fog	24 Hour Wind Movement (mi)	Amount of Evap. (in)	Ground Cover (see *)	Max.	Min.	Ground Cover (see *)	Max.	Min.
2019	03	01	48	32	0.02												
2019	03	02	49	24	0.00												
2019	03	03	41	29	0.00												
2019	03	04	43	25	0.00												
2019	03	05	44	20	0.00												
2019	03	06	37	29	0.14												
2019	03	07	46	34	0.02												
2019	03	08	43	28	0.09												
2019	03	09	50	32	0.00												
2019	03	10	51	24	0.00												
2019	03	11	56	24	0.26												
2019	03	12	49	38	0.39												
2019	03	13	53	37	0.01												
2019	03	14	57	36	0.00												
2019	03	15	62	33	0.00												
2019	03	16	60	33	0.00												
2019	03	17	71	31	0.00												
2019	03	18	69	35	0.00												
2019	03	19	71	35	0.00												
2019	03	20	73	38	0.00												
2019	03	21	58	43	T												
2019	03	22	55	35	0.05												
2019	03	23	59	48	0.03												
2019	03	24	50	47	0.00												
2019	03	25			0.31												
2019	03	26	59	38	0.00												
2019	03	27	56	35	0.24												
2019	03	28	62	35	0.05												
2019	03	29	63	43	0.00												
2019	03	30	68	36	0.00												
2019	03	31	70	35	0.00												
		Summary	56	34	1.61												

Empty, or blank, cells indicate that a data observation was not reported.

*Ground Cover: 1=Grass; 2=Fallow; 3=Bare Ground; 4-Brome grass; 5=Sod; 6=Straw mulch; 7=Grass muck; 8=Bare muck; 0=Unknown

"S" This data value failed one of NCDC's quality control tests.

"T" "At Obs." = Temperature at time of observation

"T" values in the Precipitation or Snow category above indicate a "trace" value was recorded.

"A" Values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.

Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.

Record of Climatological Observations

These data are quality controlled and may not be identical to the original observations.

Generated on 08/13/2021

National Centers for Environmental Information
151 Patton Avenue
Asheville, North Carolina 28801
Observation Time Temperature: Unknown Observation Time Precipitation: Unknown

Case 3:21-cv-05784 Document 1 Filed 10/21/21 Page 63 of 91

Y e a r	M o n t h	D a y	Temperature (F)		Precipitation			Evaporation			8 in. Depth			Soil Temperature (F)		
			24 Hrs. Ending at Observation Time	At Obs.	24 Hour Amounts Ending at Observation Time	At Obs. Time	24 Hour Wind Movement (mi)	Amount of Evap. (in)	Ground Cover (see *)	Max.	Min.	Ground Cover (see *)	Max.	Min.	Ground Cover (see *)	Max.
2019	04	01	66	46	0.00											
2019	04	02	61	53	0.03											
2019	04	03	61	41	0.02											
2019	04	04	60	46	0.14											
2019	04	05														
2019	04	06														
2019	04	07														
2019	04	08	58													
2019	04	09			48											
2019	04	10														
2019	04	11														
2019	04	12	59	45		T										
2019	04	13	52	41	0.17											
2019	04	14	51	38	0.08											
2019	04	15	53	37	0.10											
2019	04	16	60	45	0.03											
2019	04	17	66	47	0.01											
2019	04	18	76	44	T											
2019	04	19	62	52	0.22											
2019	04	20	65	49	0.00											
2019	04	21	63	42	0.00											
2019	04	22	67	40	0.02											
2019	04	23	66	49	0.00											
2019	04	24	67	37	0.00											
2019	04	25	73	46	0.00											
2019	04	26	67	45	0.00											
2019	04	27	59	44	0.01											
2019	04	28	66	34	0.00											
2019	04	29	69	38	0.00											
2019	04	30	70	39	0.00											
		Summary	63	44	0.83											

Empty, or blank, cells indicate that a data observation was not reported.

*Ground Cover: 1=Grass; 2=Fallow; 3=Bare Ground; 4=Brome grass; 5=Sod; 6=Straw mulch; 7=Grass mulch; 8=Bare mulch; 0=Unknown

"S" This data value failed one of NCDC's quality control tests.

"T" values in the Precipitation or Snow category above indicate a "trace" value was recorded.

"A" values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.

Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.

Record of Climatological Observations

These data are quality controlled and may not be identical to the original observations.

Generated on 08/13/2021

Year	Month	Day	Temperature (F)		Precipitation			Evaporation			8 in. Depth			Soil Temperature (F)			
			24 Hrs. Ending at Observation Time	At Obs.	24 Hour Amounts Ending at Observation Time	At Obs.	Rain, Melted Snow, Etc. (in)	Snow, Ice Pellets, Hail (in)	Fog	24 Hour Wind Movement (mi)	Amount of Evap. (in)	Ground Cover (see *)	Max.	Min.	Ground Cover (see *)	Max.	Min.
2019	05	01	69	37	0.00												
2019	05	02	64	44	0.00												
2019	05	03	69	41	0.00												
2019	05	04	74	45	0.00												
2019	05	05	75	46	0.00												
2019	05	06	82	45	0.00												
2019	05	07	78	49	0.00												
2019	05	08	78	47	0.00												
2019	05	09	84	49	0.00												
2019	05	10	87	46	0.00												
2019	05	11	86	48	0.00												
2019	05	12	74	48	0.00												
2019	05	13	73	48	0.00												
2019	05	14	60	52	0.13												
2019	05	15	65	50	0.17												
2019	05	16	60	54	0.03												
2019	05	17	63	52	T												
2019	05	18	73	51	0.27												
2019	05	19	63	51	0.38												
2019	05	20	61	52	0.05												
2019	05	21	65	49	T												
2019	05	22	74	46	0.14												
2019	05	23	80	55	0.00												
2019	05	24	62	52	0.01												
2019	05	25	56	50	0.37												
2019	05	26	74	50	0.00												
2019	05	27	69	58	0.00												
2019	05	28	66	55	0.00												
2019	05	29	75	52	0.00												
2019	05	30	78	55	0.00												
2019	05	31	82	56	0.00												
		Summary	72	49	1.55												

Empty, or blank, cells indicate that a data observation was not reported.

*Ground Cover: 1=Grass; 2=Fallow; 3=Bare Ground; 4-Brome grass; 5=Sod; 6=Straw mulch; 7=Grass muck; 8=Bare muck; 0=Unknown

"S" This data value failed one of NCDC's quality control tests.

"T" "At Obs." = Temperature at time of observation

"T" values in the Precipitation or Snow category above indicate a "trace" value was recorded.

"A" Values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.

Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.

Record of Climatological Observations

These data are quality controlled and may not be identical to the original observations.

Generated on 08/13/2021

National Centers for Environmental Information
151 Patton Avenue
Asheville, North Carolina 28801
Observation Time Temperature: Unknown Observation Time Precipitation: Unknown

Case 3:21-cv-05784 Document 1 Filed 10/21/21 Page 65 of 91

Year	Month	Day	Temperature (F)			Precipitation			Evaporation			8 in. Depth			Soil Temperature (F)		
			24 Hrs. Ending at Observation Time	At Obs.	24 Hour Amounts Ending at Observation Time	Rain, Melted Snow, Etc. (in)	Snow, Ice Pellets, Hail (in)	Fog	24 Hour Wind Movement (mi)	Amount of Evap. (in)	Ground Cover (see *)	Max.	Min.	Ground Cover (see *)	Max.	Min.	Min.
2019	06	01	80	53	0.00												
2019	06	02	78	53	0.00												
2019	06	03	74	49	0.00												
2019	06	04	78	46	0.00												
2019	06	05	67	55	T												
2019	06	06	64	49	0.04												
2019	06	07	64	50	0.30												
2019	06	08	68	52	T												
2019	06	09	81	45	0.00												
2019	06	10	84	58	0.00												
2019	06	11	96	61	0.00												
2019	06	12	96	63	0.00												
2019	06	13	84	57	0.00												
2019	06	14	71	56	0.00												
2019	06	15	78	55	0.00												
2019	06	16	80	54	0.00												
2019	06	17	80	56	0.00												
2019	06	18	71	55	0.00												
2019	06	19	70	50	0.00												
2019	06	20	68	53	0.06												
2019	06	21	70	55	0.00												
2019	06	22	72	54	0.00												
2019	06	23	70	54	0.00												
2019	06	24	70	51	0.00												
2019	06	25	74	52	T												
2019	06	26	76	56	0.11												
2019	06	27	62	54	0.12												
2019	06	28	74	49	0.00												
2019	06	29	80	51	0.00												
2019	06	30	83	53	0.00												
		Summary	75	53	0.63												

Empty, or blank, cells indicate that a data observation was not reported.

*Ground Cover: 1=Grass; 2=Fallow; 3=Bare Ground; 4=Brome grass; 5=Sod; 6=Straw mulch; 7=Grass mulch; 8=Bare mulch; 0=Unknown

"S" This data value failed one of NCDC's quality control tests.

"T" values in the Precipitation or Snow category above indicate a "trace" value was recorded.

"A" values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.

Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.

Record of Climatological Observations

These data are quality controlled and may not be identical to the original observations.

Generated on 08/13/2021

Year	Month	Day	Temperature (F)			Precipitation			Evaporation			8 in. Depth			Soil Temperature (F)		
			24 Hrs. Ending at Observation Time	At Obs.	24 Hour Amounts Ending at Observation Time	Rain, Melted Snow, Etc. (in)	Snow, Ice Pellets, Hail (in)	Fog	24 Hour Wind Movement (mi)	Amount of Evap. (in)	Ground Cover (see *)	Max.	Min.	Ground Cover (see *)	Max.	Min.	Min.
2019	07	01	81	56	0.59	T											
2019	07	02	67	59													
2019	07	03	71	59	0.00												
2019	07	04	79	57	0.00												
2019	07	05	74	58	0.00												
2019	07	06	67	57	0.07												
2019	07	07	73	52	0.00												
2019	07	08	76	56	0.00												
2019	07	09	73	58	0.22												
2019	07	10	75	62	0.06												
2019	07	11	80	63	0.00												
2019	07	12	83	60	0.00												
2019	07	13	81	62	0.00												
2019	07	14	84	59	0.00												
2019	07	15	76	63	0.03												
2019	07	16	81	64	0.00												
2019	07	17	74	63	0.00												
2019	07	18	75	59	T												
2019	07	19	76	50	0.00												
2019	07	20	86	54	0.00												
2019	07	21	89	55	0.00												
2019	07	22	85	57	0.00												
2019	07	23	76	61	0.00												
2019	07	24	81	53	0.00												
2019	07	25	90	53	0.00												
2019	07	26	90	60	0.00												
2019	07	27	78	61	0.01												
2019	07	28	84	55	0.00												
2019	07	29	82	60	0.00												
2019	07	30	78	60	0.00												
2019	07	31	85	56	0.00												
		Summary	79	58	0.98												

Empty, or blank, cells indicate that a data observation was not reported.

*Ground Cover: 1=Grass; 2=Fallow; 3=Bare Ground; 4-Brome grass; 5=Sod; 6=Straw mulch; 7=Grass muck; 8=Bare muck; 0=Unknown

"S" This data value failed one of NCDC's quality control tests.

"T" At Obs." = Temperature at time of observation

"T" values in the Precipitation or Snow category above indicate a "trace" value was recorded.

"A" Values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.

Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.

Record of Climatological Observations

These data are quality controlled and may not be identical to the original observations.

Generated on 08/13/2021

National Centers for Environmental Information
151 Patton Avenue
Asheville, North Carolina 28801
Observation Time Temperature: Unknown Observation Time Precipitation: Unknown

Case 3:21-cv-05784 Document 1 Filed 10/21/21 Page 68 of 91

Year	Month	Day	Temperature (F)			Precipitation			Evaporation			8 in. Depth			Soil Temperature (F)		
			24 Hrs. Ending at Observation Time	At Obs.	24 Hour Amounts Ending at Observation Time	Rain, Melted Snow, Etc. (in)	Snow, Ice Pellets, Hail (in)	Fog	24 Hour Wind Movement (mi)	Amount of Evap. (in)	Ground Cover (see *)	Max.	Min.	Ground Cover (see *)	Max.	Min.	Min.
2019	09	01	83	64	0.00												
2019	09	02	83	59	0.00												
2019	09	03	84	57	0.00												
2019	09	04	79	63	0.00												
2019	09	05	88	59	T												
2019	09	06	79	62	0.00												
2019	09	07	68	59	0.19												
2019	09	08	70	60	0.43												
2019	09	09	69	59	0.28												
2019	09	10	68	58	0.00												
2019	09	11	74	55	0.00												
2019	09	12	81	51	0.08												
2019	09	13	76	61	0.10												
2019	09	14	76	59	0.00												
2019	09	15	65	59	0.76												
2019	09	16	70	57	T												
2019	09	17	64	58	0.52												
2019	09	18	67	53	0.93												
2019	09	19	71	53	0.01												
2019	09	20	68	57	T												
2019	09	21	70	52	0.00												
2019	09	22	65	56	0.17												
2019	09	23	69	55	0.00												
2019	09	24	75	59	T												
2019	09	25	73	51	0.00												
2019	09	26	67	51	T												
2019	09	27	62	44	0.04												
2019	09	28	61	47	0.17												
2019	09	29	51	42	0.38												
2019	09	30	59	37	0.00												
		Summary	71	55	4.06												

Empty, or blank, cells indicate that a data observation was not reported.

*Ground Cover: 1=Grass; 2=Fallow; 3=Bare Ground; 4=Brome grass; 5=Sod; 6=Straw mulch; 7=Grass muck; 8=Bare muck; 0=Unknown

"S" This data value failed one of NCDC's quality control tests.

"T" values in the Precipitation or Snow category above indicate a "trace" value was recorded.

"A" values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.

Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.

Record of Climatological Observations

These data are quality controlled and may not be identical to the original observations.

Generated on 08/13/2021

Year	Month	Day	Temperature (F)			Precipitation			Evaporation			Soil Temperature (F)		
			24 Hrs. Ending at Observation Time		At Obs.	24 Hour Amounts Ending at Observation Time	At Obs. Time	24 Hour Wind Movement (mi)	Amount of Evap. (in)	Ground Cover (see *)	Max.	Min.	Ground Cover (see *)	Max.
			Max.	Min.		Rain, Melted Snow, Etc. (in)	Snow, Ice Pellets, Hail (in)	Fog	Snow, Ice Pellets, Hail, Ice on Ground (in)					
2019	10	01	63	34	0.00	T								
2019	10	02	61	36										
2019	10	03	58	50	0.13									
2019	10	04	62	50	0.10									
2019	10	05	65	44	0.00									
2019	10	06	70	42	0.00									
2019	10	07	66	42	0.07									
2019	10	08	59	38	0.02									
2019	10	09	56	33	0.00									
2019	10	10	62	32	0.00									
2019	10	11	66	34	0.00									
2019	10	12	62	36	T									
2019	10	13	64	44	0.00									
2019	10	14	63	38	0.00									
2019	10	15	62	39	T									
2019	10	16	59	53	0.35									
2019	10	17	57	51	0.43									
2019	10	18	58	50	0.04									
2019	10	19	58	47	0.59									
2019	10	20	58	48	0.08									
2019	10	21	62	51	0.01									
2019	10	22	64	44	0.13									
2019	10	23	61	40	0.00									
2019	10	24	68	39	0.00									
2019	10	25	61	43	0.04									
2019	10	26	58	36	T									
2019	10	27	60	30	0.00									
2019	10	28	56	29	0.00									
2019	10	29	47	29	0.00									
2019	10	30	55	24	0.00									
2019	10	31	53	27	0.00									
		Summary	60	40	1.99									

Empty, or blank, cells indicate that a data observation was not reported.

*Ground Cover: 1=Grass; 2=Fallow; 3=Bare Ground; 4-Brome grass; 5=Sod; 6=Straw mulch; 7=Grass muck; 8=Bare muck; 0=Unknown

"S" This data value failed one of NCDC's quality control tests.

"T" Obs. = Temperature at time of observation

"T" values in the Precipitation or Snow category above indicate a "trace" value was recorded.

"A" Values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.

Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.

Record of Climatological Observations

These data are quality controlled and may not be identical to the original observations.

Generated on 08/13/2021

National Centers for Environmental Information
151 Patton Avenue
Asheville, North Carolina 28801
Observation Time Temperature: Unknown Observation Time Precipitation: Unknown

Case 3:21-cv-05784 Document 1 Filed 10/21/21 Page 70 of 91

Year	Month	Day	Temperature (F)		Precipitation			Evaporation			8 in. Depth			Soil Temperature (F)		
			24 Hrs. Ending at Observation Time	At Obs.	24 Hour Amounts Ending at Observation Time	Rain, Melted Snow, Etc. (in)	F - Snow, Ice Pellets, Hail (in)	F - Snow, Ice Pellets, Hail (in)	24 Hour Wind Movement (mi)	Amount of Evap. (in)	Ground Cover (see *)	Max.	Min.	Ground Cover (see *)	Max.	Min.
2019	11	01	65	29	0.00											
2019	11	02	62	30	0.00											
2019	11	03	58	34	0.00											
2019	11	04	54	33	0.00											
2019	11	05	49	36	0.00											
2019	11	06	67	40	0.00											
2019	11	07	61	32	0.00											
2019	11	08	63	33	0.00											
2019	11	09	51	38	0.25											
2019	11	10	54	44	0.00											
2019	11	11	64	41	0.00											
2019	11	12	51	42	0.15											
2019	11	13	53	39	0.00											
2019	11	14	57	38	0.00											
2019	11	15	58	41	0.16											
2019	11	16	56	47	0.01											
2019	11	17	56	49	0.09											
2019	11	18	58	52	0.09											
2019	11	19	55	45	0.50											
2019	11	20	56	34	0.00											
2019	11	21	55	32	0.00											
2019	11	22	50	28	0.00											
2019	11	23	50	32	0.00											
2019	11	24	51	38	0.18											
2019	11	25	51	39	0.04											
2019	11	26	44	41	0.10											
2019	11	27	47	36	0.00											
2019	11	28	44	37	0.00											
2019	11	29	45	24	0.00											
2019	11	30	21	T												
		Summary	55	37	1.57											

Empty, or blank, cells indicate that a data observation was not reported.

*Ground Cover: 1=Grass; 2=Fallow; 3=Bare Ground; 4=Brome grass; 5=Sod; 6=Straw mulch; 7=Grass muck; 8=Bare muck; 0=Unknown

"S" This data value failed one of NCDC's quality control tests.

"At Obs." = Temperature at time of observation

"T" values in the Precipitation or Snow category above indicate a "trace" value was recorded.

"A" values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.

Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.

Record of Climatological Observations

These data are quality controlled and may not be identical to the original observations.

Generated on 08/13/2021

Observation Time Temperature: Unknown Observation Time Precipitation: Unknown

Case 3:21-cv-05784 Document 1 Filed 10/21/21 Page 71 of 91

Year	Month	Day	Temperature (F)			Precipitation			Evaporation			8 in. Depth			Soil Temperature (F)		
			24 Hrs. Ending at Observation Time	At Obs.	24 Hour Amounts Ending at Observation Time	Rain, Melted Snow, Etc. (in)	Snow, Ice Pellets, Hail (in)	Fog	24 Hour Wind Movement (mi)	Amount of Evap. (in)	Ground Cover (see *)	Max.	Min.	Ground Cover (see *)	Max.	Min.	Min.
2019	12	01			0.16												
2019	12	02	T														
2019	12	03	28		0.00												
2019	12	04	37		0.00												
2019	12	05	36		0.00												
2019	12	06	33		0.24												
2019	12	07	42		0.39												
2019	12	08	45		0.00												
2019	12	09	35		0.00												
2019	12	10	39		0.38												
2019	12	11	42		0.31												
2019	12	12	45		0.34												
2019	12	13	50		0.00												
2019	12	14	47		0.01												
2019	12	15	35		0.00												
2019	12	16	31		0.00												
2019	12	17	30		0.00												
2019	12	18	29		0.18												
2019	12	19	38		0.64												
2019	12	20	50		0.63												
2019	12	21	42		0.88												
2019	12	22	41		0.18												
2019	12	23	33		0.07												
2019	12	24	33		T												
2019	12	25	31		0.02												
2019	12	26	26		0.01												
2019	12	27	38		0.01												
2019	12	28	41		0.00												
2019	12	29	37		0.03												
2019	12	30	38		0.00												
2019	12	31	42		0.19												
		Summary	48		4.67												
					37												

Empty, or blank, cells indicate that a data observation was not reported.

*Ground Cover: 1=Grass; 2=Fallow; 3=Bare Ground; 4-Brome grass; 5=Sod; 6=Straw mulch; 7=Grass muck; 8=Bare muck; 0=Unknown

"S" This data value failed one of NCDC's quality control tests.

"T" values in the Precipitation or Snow category above indicate a "trace" value was recorded.

"A" Values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.

Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.

Record of Climatological Observations

These data are quality controlled and may not be identical to the original observations.

Generated on 08/13/2021

National Centers for Environmental Information
151 Patton Avenue
Asheville, North Carolina 28801
Observation Time Temperature: Unknown Observation Time Precipitation: Unknown

Year	Month	Day	Temperature (F)			Precipitation			Evaporation			8 in. Depth			Soil Temperature (F)		
			24 Hrs. Ending at Observation Time	At Obs.	24 Hour Amounts Ending at Observation Time	Rain, Melted Snow, Etc. (in)	F - Snow, Ice Pellets, Hail (in)	F - Snow, Ice Pellets, Hail (in)	24 Hour Wind Movement (mi)	Amount of Evap. (in)	Ground Cover (see *)	Max.	Min.	Ground Cover (see *)	Max.	Min.	Min.
2020	01	01	57	46	0.18												
2020	01	02	53	43	0.05												
2020	01	03	62	46	0.17												
2020	01	04	49	40	0.12												
2020	01	05	49	43	0.14												
2020	01	06	52	46	0.33												
2020	01	07	57	47	0.07												
2020	01	08	48	34	0.24												
2020	01	09	42	34	0.01												
2020	01	10	49	41	0.37												
2020	01	11	47	42	0.17												
2020	01	12	47	39	0.29												
2020	01	13	40	38	0.20												
2020	01	14	41	34	0.04												
2020	01	15	43	33	0.19												
2020	01	16	43	31	0.24												
2020	01	17	43	33	0.21												
2020	01	18	42	38	0.43												
2020	01	19	52	42	0.02												
2020	01	20	47	40	0.00												
2020	01	21	51	42	0.19												
2020	01	22	51	45	0.09												
2020	01	23	55	45	0.97												
2020	01	24	56	46	0.23												
2020	01	25	58	46	0.18												
2020	01	26	54	45	0.31												
2020	01	27	53	42	0.94												
2020	01	28	54	48	0.33												
2020	01	29	49	46	0.43												
2020	01	30	53	42	0.21												
2020	01	31	62	53	0.00												
		Summary	50	42	7.35												

Empty, or blank, cells indicate that a data observation was not reported.

*Ground Cover: 1=Grass; 2=Fallow; 3=Bare Ground; 4-Brome grass; 5=Sod; 6=Straw mulch; 7=Grass muck; 8=Bare muck; 0=Unknown

"S" This data value failed one of NCDC's quality control tests.

"T" values in the Precipitation or Snow category above indicate a "trace" value was recorded.

"A" Values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.

Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.
Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.

Record of Climatological Observations

These data are quality controlled and may not be identical to the original observations.

Generated on 08/13/2021

Observation Time Temperature: Unknown Observation Time Precipitation: Unknown

Case 3:21-cv-05784 Document 1 Filed 10/21/21 Page 73 of 91

Y e a r	M o n t h	D a y	Temperature (F)			Precipitation			Evaporation			8 in. Depth			Soil Temperature (F)			
			24 Hrs. Ending at Observation Time	At Obs.	24 Hour Amounts Ending at Observation Time	Rain, Melted Snow, Etc. (in)	F - Snow, Ice Pellets, Hail (in)	F - Snow, Ice Pellets, Hail (in)	24 Hour Wind Movement (mi)	Amount of Evap. (in)	At Obs. Time	Snow, Ice Pellets, Hail, Ice on Ground (in)	Ground Cover (see *)	Max.	Min.	Ground Cover (see *)	Max.	Min.
2020	02	01	58	39	0.25													
2020	02	02	45	30	0.00													
2020	02	03	46	28	0.02													
2020	02	04	43	27	0.00													
2020	02	05	52	42	0.16													
2020	02	06	60	50	0.02													
2020	02	07	55	46	0.03													
2020	02	08	47	36	0.13													
2020	02	09	46	36	0.00													
2020	02	10	52	34	0.00													
2020	02	11	45	32	0.01													
2020	02	12	52	31	0.00													
2020	02	13	45	31	0.13													
2020	02	14	51	37	T													
2020	02	15	47	43	0.47													
2020	02	16	51	34	0.03													
2020	02	17	50	31	0.00													
2020	02	18	53	29	0.00													
2020	02	19	56	28	0.00													
2020	02	20	54	30	0.00													
2020	02	21	59	26	0.00													
2020	02	22	57	29	0.00													
2020	02	23	52	42	0.07													
2020	02	24	49	35	T													
2020	02	25	55	31	0.00													
2020	02	26	57	35	0.00													
2020	02	27	61	31	0.00													
2020	02	28	59	32	0.01													
2020	02	29	48	35	0.27													
		Summary	52	34	1.60													

Empty, or blank, cells indicate that a data observation was not reported.

*Ground Cover: 1=Grass; 2=Fallow; 3=Bare Ground; 4=Brome grass; 5=Sod; 6=Straw mulch; 7=Grass muck; 8=Bare muck; 0=Unknown

"S" This data value failed one of NCDC's quality control tests.

"T" Obs. = Temperature at time of observation

"A" values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.

Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.

Record of Climatological Observations

These data are quality controlled and may not be identical to the original observations.

Generated on 08/13/2021

Observation Time Temperature: Unknown Observation Time Precipitation: Unknown

Year	Month	Day	Temperature (F)			Precipitation			Evaporation			8 in. Depth			Soil Temperature (F)		
			24 Hrs. Ending at Observation Time	At Obs.	24 Hour Amounts Ending at Observation Time	Rain, Melted Snow, Etc. (in)	Snow, Ice Pellets, Hail (in)	Fog	24 Hour Wind Movement (mi)	Amount of Evap. (in)	Ground Cover (see *)	Max.	Min.	Ground Cover (see *)	Max.	Min.	Min. Depth
2020	03	01	47	33	T												
2020	03	02	50	42	0.01												
2020	03	03	60	47	0.00												
2020	03	04	57	39	0.01												
2020	03	05	59	34	0.00												
2020	03	06	50	42	0.36												
2020	03	07	48	38	0.06												
2020	03	08	50	31	0.00												
2020	03	09	56	29	0.00												
2020	03	10	63	28	0.00												
2020	03	11	57	37	T												
2020	03	12	57	30	0.00												
2020	03	13	42	37	0.11												
2020	03	14	42	33	0.71												
2020	03	15	46	35	0.00												
2020	03	16	62	34	0.00												
2020	03	17	61	28	0.00												
2020	03	18	59	37	0.00												
2020	03	19	65	32	0.00												
2020	03	20	68	36	0.00												
2020	03	21	61	37	0.00												
2020	03	22	63	33	0.00												
2020	03	23	53	45	0.06												
2020	03	24	51	40	0.34												
2020	03	25	51	37	0.06												
2020	03	26	50	31	0.00												
2020	03	27	50	42	0.10												
2020	03	28	53	47	0.07												
2020	03	29	58	48	0.25												
2020	03	30	52	45	0.26												
2020	03	31	53	41	0.15												
		Summary	55	37	2.55												

Empty, or blank, cells indicate that a data observation was not reported.

*Ground Cover: 1=Grass; 2=Fallow; 3=Bare Ground; 4-Brome grass; 5=Sod; 6=Straw mulch; 7=Grass muck; 8=Bare muck; 0=Unknown

"S" This data value failed one of NCDC's quality control tests.

"T" "At Obs." = Temperature at time of observation

"T" values in the Precipitation or Snow category above indicate a "trace" value was recorded.

"A" Values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.

Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.

Record of Climatological Observations

These data are quality controlled and may not be identical to the original observations.

Generated on 08/13/2021

Observation Time Temperature: Unknown Observation Time Precipitation: Unknown

Case 3:21-cv-05784 Document 1 Filed 10/21/21 Page 75 of 91

Year	Month	Day	Temperature (F)		Precipitation			Evaporation			8 in. Depth			Soil Temperature (F)		
			24 Hrs. Ending at Observation Time	At Obs.	Rain, Melted Snow, Etc. (in)	F- Snow, Ice Pellets, Hail (in)	F- Snow, Ice Pellets, Hail (in)	24 Hour Wind Movement (mi)	Amount of Evap. (in)	Ground Cover (see *)	Max.	Min.	Ground Cover (see *)	Max.	Min.	
2020	04	01	51	40	0.09											
2020	04	02	51	39	0.11											
2020	04	03	50	38		T										
2020	04	04	54	36	0.05											
2020	04	05	65	40		T										
2020	04	06	64	37	0.00											
2020	04	07	61	38	0.00											
2020	04	08	73	37	0.00											
2020	04	09	76	39	0.00											
2020	04	10	71	41	0.00											
2020	04	11	62	38	0.00											
2020	04	12	66	36	0.00											
2020	04	13	68	33	0.00											
2020	04	14	70	37	0.00											
2020	04	15	68	48	0.00											
2020	04	16	70	38	0.00											
2020	04	17	75	36	0.00											
2020	04	18	54	48	0.16											
2020	04	19	62	44	0.00											
2020	04	20	70	41	0.00											
2020	04	21	63	49	0.00											
2020	04	22	60	49	0.25											
2020	04	23	62	49	0.00											
2020	04	24	61	50	0.01											
2020	04	25	68	47	0.17											
2020	04	26	67	40	0.04											
2020	04	27	68	48	0.03											
2020	04	28	74	46	0.00											
2020	04	29	72	53	T											
2020	04	30	66	48	0.00											
		Summary	65	42	0.91											

Empty, or blank, cells indicate that a data observation was not reported.

*Ground Cover: 1=Grass; 2=Fallow; 3=Bare Ground; 4=Brome grass; 5=Sod; 6=Straw mulch; 7=Grass mulch; 8=Bare mulch; 0=Unknown

"S" This data value failed one of NCDC's quality control tests.

"T" values in the Precipitation or Snow category above indicate a "trace" value was recorded.

"A" values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.

Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.

Record of Climatological Observations

These data are quality controlled and may not be identical to the original observations.

Generated on 08/13/2021

Year	Month	Day	Temperature (F)			Precipitation			Evaporation			8 in. Depth			Soil Temperature (F)			
			24 Hrs. Ending at Observation Time		At Obs.	24 Hour Amounts Ending at Observation Time		At Obs. Time	24 Hour Wind Movement (mi)		Amount of Evap. (in)	Ground Cover (see *)		Max.	Min.	Ground Cover (see *)	Max.	Min.
			Max.	Min.		Rain, Melted Snow, Etc. (in)	F - Snow, Ice Pellets, Hail (in)	F - Snow, Ice Pellets, Hail, Ice on Ground (in)	Snow, Ice Pellets, Hail, Ice on Ground (in)									
2020	05	01	63	38	0.07													
2020	05	02	58	50	0.27													
2020	05	03	59	42	0.32													
2020	05	04	70	37	0.03													
2020	05	05	74	49	0.01													
2020	05	06	65	48	0.09													
2020	05	07	75	38	0.00													
2020	05	08	82	49	0.00													
2020	05	09	87	55	0.00													
2020	05	10	87	56	0.00													
2020	05	11	69	50	0.12													
2020	05	12	64	52	0.07													
2020	05	13	63	52	0.07													
2020	05	14	57	53	0.32													
2020	05	15	68	53	0.03													
2020	05	16	70	54	0.20													
2020	05	17	70	50	0.01													
2020	05	18	62	53	0.30													
2020	05	19	63	52	T													
2020	05	20	62	50	0.07													
2020	05	21	60	49	0.16													
2020	05	22	62	46	0.07													
2020	05	23	63	49	0.00													
2020	05	24	74	49	0.00													
2020	05	25	67	52	0.07													
2020	05	26	72	58	0.00													
2020	05	27	84	47	0.00													
2020	05	28	91	51	0.00													
2020	05	29	83	59	0.00													
2020	05	30	63	52	0.40													
2020	05	31	66	52	0.00													
		Summary	69	50	2.68													

Empty, or blank, cells indicate that a data observation was not reported.

*Ground Cover: 1=Grass; 2=Fallow; 3=Bare Ground; 4-Brome grass; 5=Sod; 6=Straw mulch; 7=Grass muck; 8=Bare muck; 0=Unknown

"S" This data value failed one of NCDC's quality control tests.

"T" = Temperature at time of observation

"T" values in the Precipitation or Snow category above indicate a "trace" value was recorded.

"A" values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.

Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.

Record of Climatological Observations

These data are quality controlled and may not be identical to the original observations.

Generated on 08/13/2021

National Centers for Environmental Information
151 Patton Avenue
Asheville, North Carolina 28801
Observation Time Temperature: Unknown Observation Time Precipitation: Unknown

Year	Month	Day	Temperature (F)			Precipitation			Evaporation			8 in. Depth			Soil Temperature (F)			
			24 Hrs. Ending at Observation Time	At Obs.	24 Hour Amounts Ending at Observation Time	Rain, Melted Snow, Etc. (in)	F - Snow, Ice Pellets, Hail (in)	F - Snow, Ice Pellets, Hail (in)	24 Hour Wind Movement (mi)	Amount of Evap. (in)	At Obs. Time	Snow, Ice Pellets, Hail, Ice on Ground (in)	Ground Cover (see *)	Max.	Min.	Ground Cover (see *)	Max.	Min.
2020	06	01	73	45	0.00													
2020	06	02	79	46	0.00													
2020	06	03	74	55	0.00													
2020	06	04	73	51	0.00													
2020	06	05	70	52	0.44													
2020	06	06	61	50	0.61													
2020	06	07	61	50	0.23													
2020	06	08	64	54	0.20													
2020	06	09	65	52	0.45													
2020	06	10	79	61	0.00													
2020	06	11	75	59	0.01													
2020	06	12	62	55	0.08													
2020	06	13	61	52	0.31													
2020	06	14	68	49	0.01													
2020	06	15	65	56	0.68													
2020	06	16	66	53	0.18													
2020	06	17	74	50	0.00													
2020	06	18	82	51	0.00													
2020	06	19	87	54	0.00													
2020	06	20	70	61	0.20													
2020	06	21	76	60	0.00													
2020	06	22	86	52	0.00													
2020	06	23	94	60	0.00													
2020	06	24	79	61	0.00													
2020	06	25	85	60	0.00													
2020	06	26	87	61	0.00													
2020	06	27	69	57	0.00													
2020	06	28	71	56	T													
2020	06	29	74	51	0.00													
2020	06	30	71	59	T													
		Summary	73	54	3.40													

Empty, or blank, cells indicate that a data observation was not reported.

*Ground Cover: 1=Grass; 2=Fallow; 3=Bare Ground; 4=Brome grass; 5=Sod; 6=Straw mulch; 7=Grass muck; 8=Bare muck; 0=Unknown

"S" This data value failed one of NCDC's quality control tests.

"T" values in the Precipitation or Snow category above indicate a "trace" value was recorded.

"A" values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.

Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.

Record of Climatological Observations

These data are quality controlled and may not be identical to the original observations.

Generated on 08/13/2021

Year	Month	Day	Temperature (F)			Precipitation			Evaporation			8 in. Depth			Soil Temperature (F)		
			24 Hrs. Ending at Observation Time	At Obs.	24 Hour Amounts Ending at Observation Time	Rain, Melted Snow, Etc. (in)	Snow, Ice Pellets, Hail (in)	Fog	24 Hour Wind Movement (mi)	Amount of Evap. (in)	Ground Cover (see *)	Max.	Min.	Ground Cover (see *)	Max.	Min.	Min.
2020	07	01	68	56	0.04												
2020	07	02	72	57	0.00												
2020	07	03	71	54	0.00												
2020	07	04	73	58	0.00												
2020	07	05	75	58	0.00												
2020	07	06	69	56	0.00												
2020	07	07	69	57	0.04												
2020	07	08	75	57	0.00												
2020	07	09	78	56	0.00												
2020	07	10	80	58	0.00												
2020	07	11	77	54	0.00												
2020	07	12	77	59	0.00												
2020	07	13	80	51	0.00												
2020	07	14	85	56	0.00												
2020	07	15	87	61	0.00												
2020	07	16	83	61	0.00												
2020	07	17	73	61	0.00												
2020	07	18	85	56	0.00												
2020	07	19	90	57	0.00												
2020	07	20	94	60	0.00												
2020	07	21	88	62	0.00												
2020	07	22	81	62	0.00												
2020	07	23	76	60	0.00												
2020	07	24	71	58	0.00												
2020	07	25	82	51	0.00												
2020	07	26	100	57	0.00												
2020	07	27	99	62	0.00												
2020	07	28	89	61	0.00												
2020	07	29	93	60	0.00												
2020	07	30	96	62	0.00												
2020	07	31	89	63	0.00												
		Summary	81	58	0.08												

Empty, or blank, cells indicate that a data observation was not reported.

*Ground Cover: 1=Grass; 2=Fallow; 3=Bare Ground; 4-Brome grass; 5=Sod; 6=Straw mulch; 7=Grass muck; 8=Bare muck; 0=Unknown

"S" This data value failed one of NCDC's quality control tests.

"T" values in the Precipitation or Snow category above indicate a "trace" value was recorded.

"A" Values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.

Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.

Record of Climatological Observations

These data are quality controlled and may not be identical to the original observations.

Generated on 08/13/2021

Observation Time Temperature: Unknown Observation Time Precipitation: Unknown

Case 3:21-cv-05784 Document 1 Filed 10/21/21 Page 79 of 91

Year	Month	Day	Temperature (F)			Precipitation			Evaporation			8 in. Depth			Soil Temperature (F)		
			24 Hrs. Ending at Observation Time	At Obs.	24 Hour Amounts Ending at Observation Time	Rain, Melted Snow, Etc. (in)	Snow, Ice Pellets, Hail (in)	Fog	24 Hour Wind Movement (mi)	Amount of Evap. (in)	Ground Cover (see *)	Max.	Min.	Ground Cover (see *)	Max.	Min.	Min.
2020	08	01	82	60	0.00												
2020	08	02	86	61	0.00												
2020	08	03	84	58	0.00												
2020	08	04	87	63	0.00												
2020	08	05	85	60	0.00												
2020	08	06	73	59	0.21												
2020	08	07	79	54	0.00												
2020	08	08	78	61	T												
2020	08	09	84	55	0.00												
2020	08	10	90	62	0.00												
2020	08	11	80	52	0.00												
2020	08	12	73	57	0.00												
2020	08	13	78	49	0.00												
2020	08	14	87	53	0.00												
2020	08	15	99	59	0.00												
2020	08	16	96	64	0.00												
2020	08	17	92	64	0.00												
2020	08	18	84	63	0.00												
2020	08	19	87	59	0.00												
2020	08	20	84	64	0.02												
2020	08	21	77	61	0.09												
2020	08	22	79	57	0.00												
2020	08	23	84	54	0.00												
2020	08	24	81	57	0.00												
2020	08	25	82	57	0.00												
2020	08	26	82	57	0.00												
2020	08	27	84	55	0.00												
2020	08	28	84	58	0.00												
2020	08	29	77	57	0.00												
2020	08	30	77	47	0.00												
2020	08	31	76	58	0.00												
		Summary	83	58	0.32												

Empty, or blank, cells indicate that a data observation was not reported.

*Ground Cover: 1=Grass; 2=Fallow; 3=Bare Ground; 4-Brome grass; 5=Sod; 6=Straw mulch; 7=Grass muck; 8=Bare muck; 0=Unknown

"S" This data value failed one of NCDC's quality control tests.

"T" = Temperature at time of observation

"T" values in the Precipitation or Snow category above indicate a "trace" value was recorded.

"A" values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.

Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.

Record of Climatological Observations

These data are quality controlled and may not be identical to the original observations.

Generated on 08/13/2021

Year	Month	Day	Temperature (F)			Precipitation			Evaporation			8 in. Depth			Soil Temperature (F)		
			24 Hrs. Ending at Observation Time	At Obs.	24 Hour Amounts Ending at Observation Time	Rain, Melted Snow, Etc. (in)	Snow, Ice Pellets, Hail (in)	Fog	24 Hour Wind Movement (mi)	Amount of Evap. (in)	Ground Cover (see *)	Max.	Min.	Ground Cover (see *)	Max.	Min.	Min.
2020	09	01	89	60	0.00												
2020	09	02	91	59	0.00												
2020	09	03	95	57	T												
2020	09	04	87	61	0.00												
2020	09	05	76	58	0.00												
2020	09	06	89	52	0.00												
2020	09	07	92	58	0.00												
2020	09	08	82	65	0.00												
2020	09	09	91	67	0.00												
2020	09	10	81	58	0.00												
2020	09	11	64	52	0.00												
2020	09	12	65	50	0.00												
2020	09	13	64	49	0.00												
2020	09	14	74	54	0.00												
2020	09	15	76	57	0.00												
2020	09	16	71	52	0.00												
2020	09	17	74	55	0.00												
2020	09	18	68	61	0.35												
2020	09	19	73	57	T												
2020	09	20	75	56	0.00												
2020	09	21	77	53	0.00												
2020	09	22	74	62	T												
2020	09	23	68	60	0.65												
2020	09	24	72	60	0.01												
2020	09	25	65	55	0.27												
2020	09	26	70	52	0.01												
2020	09	27	75	51	0.00												
2020	09	28	87	48	0.00												
2020	09	29	85	50	0.00												
2020	09	30	82	51	0.00												
		Summary	78	56	1.29												

Empty, or blank, cells indicate that a data observation was not reported.

*Ground Cover: 1=Grass; 2=Fallow; 3=Bare Ground; 4=Brome grass; 5=Sod; 6=Straw mulch; 7=Grass muck; 8=Bare muck; 0=Unknown

"S" This data value failed one of NCDC's quality control tests.

"T" values in the Precipitation or Snow category above indicate a "trace" value was recorded.

"A" values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.

Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.

Record of Climatological Observations

These data are quality controlled and may not be identical to the original observations.

Generated on 08/13/2021

National Centers for Environmental Information
151 Patton Avenue
Asheville, North Carolina 28801
Observation Time Temperature: Unknown Observation Time Precipitation: Unknown

Year	Month	Day	Temperature (F)			Precipitation			Evaporation			8 in. Depth			Soil Temperature (F)		
			24 Hrs. Ending at Observation Time	At Obs.	24 Hour Amounts Ending at Observation Time	Rain, Melted Snow, Etc. (in)	Snow, Ice Pellets, Hail (in)	Fog	24 Hour Wind Movement (mi)	Amount of Evap. (in)	Ground Cover (see *)	Max.	Min.	Ground Cover (see *)	Max.	Min.	Ground Cover (see *)
2020	10	01	75	55	0.00												
2020	10	02	80	53	0.00												
2020	10	03	78	57	0.00												
2020	10	04	70	56	0.00												
2020	10	05	75	50	0.00												
2020	10	06	79	49	0.00												
2020	10	07	75	51	0.00												
2020	10	08	64	56	0.00												
2020	10	09	74	57	0.05												
2020	10	10	64	55	0.92												
2020	10	11	60	55	0.33												
2020	10	12	65	55	0.14												
2020	10	13	65	50	0.24												
2020	10	14	64	44	0.05												
2020	10	15	65	40	0.00												
2020	10	16	66	43	0.00												
2020	10	17	66	53	0.02												
2020	10	18	70	55	0.00												
2020	10	19	65	48	0.01												
2020	10	20	63	48	T												
2020	10	21	59	37	T												
2020	10	22	57	33	0.00												
2020	10	23	55	34	T												
2020	10	24	51	42	T												
2020	10	25	48	28	0.00												
2020	10	26	55	26	0.00												
2020	10	27	59	29	0.00												
2020	10	28	64	35	0.00												
2020	10	29	59	40	0.00												
2020	10	30	62	40	0.05												
2020	10	31	62	36	0.00												
		Summary	65	45	1.81												

Empty, or blank, cells indicate that a data observation was not reported.

*Ground Cover: 1=Grass; 2=Fallow; 3=Bare Ground; 4-Brome grass; 5=Sod; 6=Straw mulch; 7=Grass muck; 8=Bare muck; 0=Unknown

"S" This data value failed one of NCDC's quality control tests.

"T" = Temperature at time of observation

"T" values in the Precipitation or Snow category above indicate a "trace" value was recorded.

"A" values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.

Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.

Case 3:21-cv-05784 Document 1 Filed 10/21/21 Page 81 of 91

Record of Climatological Observations

These data are quality controlled and may not be identical to the original observations.

Generated on 08/13/2021

Year	Month	Day	Temperature (F)			Precipitation			Evaporation			Soil Temperature (F)		
			24 Hrs. Ending at Observation Time		At Obs.	24 Hour Amounts Ending at Observation Time	At Obs. Time	24 Hour Wind Movement (mi)	Amount of Evap. (in)	Ground Cover (see *)	Max.	Min.	Ground Cover (see *)	Max.
			Max.	Min.		Rain, Melted Snow, Etc. (in)	Snow, Ice Pellets, Hail (in)	Fog	Snow, Ice Pellets, Hail, Ice on Ground (in)					
2020	11	01	65	33		0.00								
2020	11	02	67	34		0.00								
2020	11	03	63	48										
2020	11	04	68	62										
2020	11	05	64	51										
2020	11	06	52	37										
2020	11	07	49	31										
2020	11	08	48	30										
2020	11	09	47	33										
2020	11	10	52	39										
2020	11	11	51	33										
2020	11	12	50	32										
2020	11	13	53	42										
2020	11	14	50	42										
2020	11	15	57	47										
2020	11	16	53	45										
2020	11	17	58	42										
2020	11	18	52	46										
2020	11	19	53	42										
2020	11	20	50	33										
2020	11	21	42	35										
2020	11	22	47	31										
2020	11	23	52	42										
2020	11	24	52	41										
2020	11	25	50	39										
2020	11	26	51	37										
2020	11	27	48	33										
2020	11	28	45	39										
2020	11	29	52	38										
2020	11	30	52	32										
		Summary	53	39										

Empty, or blank, cells indicate that a data observation was not reported.

*Ground Cover: 1=Grass; 2=Fallow; 3=Bare Ground; 4=Brome grass; 5=Sod; 6=Straw mulch; 7=Grass mulch; 8=Bare mulch; 0=Unknown

"S" This data value failed one of NCDC's quality control tests.

"T" values in the Precipitation or Snow category above indicate a "trace" value was recorded.

"A" values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.

Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.

Record of Climatological Observations

These data are quality controlled and may not be identical to the original observations.

Generated on 08/13/2021

Observation Time Temperature: Unknown Observation Time Precipitation: Unknown

Case 3:21-cv-05784 Document 1 Filed 10/21/21 Page 83 of 91

Year	Month	Day	Temperature (F)		Precipitation			Evaporation			8 in. Depth			Soil Temperature (F)		
			24 Hrs. Ending at Observation Time	At Obs.	Rain, Melted Snow, Etc. (in)	F- Snow, Ice Pellets, Hail (in)	F- Snow, Ice Pellets, Hail (in)	24 Hour Wind Movement (mi)	Amount of Evap. (in)	Ground Cover (see *)	Max.	Min.	Ground Cover (see *)	Max.	Min.	
2020	12	01	53	31	0.00											
2020	12	02	55	37	0.00											
2020	12	03	49	30	0.00											
2020	12	04	51	27	0.00											
2020	12	05	47	32	0.01											
2020	12	06	45	38	0.08											
2020	12	07	49	34	0.00											
2020	12	08	52	37	0.27											
2020	12	09	53	34	0.01											
2020	12	10	45	36	0.11											
2020	12	11	44	34	0.45											
2020	12	12	48	33	0.02											
2020	12	13	42	39	0.32											
2020	12	14	49	41	0.01											
2020	12	15	51	42	0.12											
2020	12	16	52	46	0.44											
2020	12	17	52	40	0.02											
2020	12	18	53	45	0.14											
2020	12	19	55	48	0.41											
2020	12	20	55	47	1.43											
2020	12	21	62	44	0.35											
2020	12	22	49	32	0.08											
2020	12	23	47	29	0.00											
2020	12	24	47	26	0.00											
2020	12	25	43	35	0.59											
2020	12	26	51	39	0.06											
2020	12	27	50	31	0.03											
2020	12	28	46	27	0.00											
2020	12	29	41	26	0.04											
2020	12	30	49	39	0.39											
2020	12	31	53	47	0.03											
		Summary	50	36	5.41											

Empty, or blank, cells indicate that a data observation was not reported.

*Ground Cover: 1=Grass; 2=Fallow; 3=Bare Ground; 4-Brome grass; 5=Sod; 6=Straw mulch; 7=Grass muck; 8=Bare muck; 0=Unknown

"S" This data value failed one of NCDC's quality control tests.

"T" values in the Precipitation or Snow category above indicate a "trace" value was recorded.

"A" Values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.

Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.

Record of Climatological Observations

These data are quality controlled and may not be identical to the original observations.

Generated on 08/13/2021

Observation Time Temperature: Unknown Observation Time Precipitation: Unknown

Case 3:21-cv-05784 Document 1 Filed 10/21/21 Page 84 of 91

Year	Month	Day	Temperature (F)		Precipitation			Evaporation			8 in. Depth			Soil Temperature (F)		
			24 Hrs. Ending at Observation Time	At Obs.	Rain, Melted Snow, Etc. (in)	F Snow, Ice Pellets, Hail (in)	F Snow, Ice Pellets, Hail (in)	24 Hour Wind Movement (mi)	Amount of Evap. (in)	Ground Cover (see *)	Max.	Min.	Ground Cover (see *)	Max.	Min.	
2021	01	01	51	46	0.23											
2021	01	02	52	49	0.89											
2021	01	03	53	43	0.34											
2021	01	04	52	45	0.71											
2021	01	05	50	44	0.01											
2021	01	06	53	46	0.85											
2021	01	07	52	45	0.01											
2021	01	08	52	32	0.18											
2021	01	09	48	32	0.00											
2021	01	10	46	42	0.13											
2021	01	11	47	44	0.67											
2021	01	12	61	45	1.89											
2021	01	13	61	40	0.02											
2021	01	14	55	36	0.01											
2021	01	15	50	39	0.17											
2021	01	16	50	41	0.00											
2021	01	17	51	36	0.04											
2021	01	18	53	32	0.00											
2021	01	19	52	30	0.00											
2021	01	20	48	28	T											
2021	01	21	47	40	0.14											
2021	01	22	52	29	T											
2021	01	23	46	26	0.00											
2021	01	24	41	38	0.38											
2021	01	25	44	33	T											
2021	01	26	42	35	0.13											
2021	01	27	45	38	0.15											
2021	01	28	46	40	0.09											
2021	01	29	48	39	0.07											
2021	01	30	46	42	0.16											
2021	01	31	51	44	0.22											
		Summary	50	39	7.49											

Empty, or blank, cells indicate that a data observation was not reported.

*Ground Cover: 1=Grass; 2=Fallow; 3=Bare Ground; 4-Brome grass; 5=Sod; 6=Straw mulch; 7=Grass muck; 8=Bare muck; 0=Unknown

"S" This data value failed one of NCDC's quality control tests.

"T" = Temperature at time of observation

"I" values in the Precipitation or Snow category above indicate a "trace" value was recorded.

"A" values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.

Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.

Record of Climatological Observations

These data are quality controlled and may not be identical to the original observations.

Generated on 08/13/2021

Observation Time Temperature: Unknown Observation Time Precipitation: Unknown

Case 3:21-cv-05784 Document 1 Filed 10/21/21 Page 85 of 91

Year	Month	Day	Temperature (F)			Precipitation			Evaporation			8 in. Depth			Soil Temperature (F)		
			24 Hrs. Ending at Observation Time	At Obs.	Min.	Rain, Melted Snow, Etc. (in)	F- Snow, Ice Pellets, Hail (in)	F- Snow, Ice Pellets, Hail (in)	24 Hour Wind Movement (mi)	Amount of Evap. (in)	At Obs. Time	Snow, Ice Pellets, Hail, Ice on Ground (in)	Ground Cover (see *)	Max.	Min.	Max.	Min.
2021	02	01	51	46	0.52												
2021	02	02	49	41	0.24												
2021	02	03	48	39	0.17												
2021	02	04	47	41	0.03												
2021	02	05	53	38	0.06												
2021	02	06	48	33	0.06												
2021	02	07	50	39	0.06												
2021	02	08	47	32	0.00												
2021	02	09	46	28	0.00												
2021	02	10	47	30	0.00												
2021	02	11	40	29	0.06												
2021	02	12	31	25	0.80												
2021	02	13	30	25	0.19												
2021	02	14	33	28	0.49												
2021	02	15	49	31	0.18												
2021	02	16	49	36	0.02												
2021	02	17	50	33	0.01												
2021	02	18	42	35	0.18												
2021	02	19	50	37	0.07												
2021	02	20	52	38	0.03												
2021	02	21	51	44	T												
2021	02	22	53	43	0.18												
2021	02	23	50	36	0.02												
2021	02	24	48	31	0.01												
2021	02	25	51	40	0.14												
2021	02	26	50	41	0.25												
2021	02	27	52	36	0.01												
2021	02	28	58	44	0.00												
		Summary	47	36	3.78												

Empty, or blank, cells indicate that a data observation was not reported.

*Ground Cover: 1=Grass; 2=Fallow; 3=Bare Ground; 4=Brome grass; 5=Sod; 6=Straw mulch; 7=Grass muck; 8=Bare muck; 0=Unknown

"s" This data value failed one of NCDC's quality control tests.

"At Obs." = Temperature at time of observation

"T" values in the Precipitation or Snow category above indicate a "trace" value was recorded.

"A" values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.

Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.

Record of Climatological Observations

These data are quality controlled and may not be identical to the original observations.

Generated on 08/13/2021

Observation Time Temperature: Unknown Observation Time Precipitation: Unknown

Case 3:21-cv-05784 Document 1 Filed 10/21/21 Page 86 of 91

Year	Month	Day	Temperature (F)		Precipitation			Evaporation			8 in. Depth			Soil Temperature (F)		
			24 Hrs. Ending at Observation Time	At Obs.	Rain, Melted Snow, Etc. (in)	F - Snow, Ice Pellets, Hail (in)	F - Snow, Ice Pellets, Hail (in)	24 Hour Wind Movement (mi)	Amount of Evap. (in)	Ground Cover (see *)	Max.	Min.	Ground Cover (see *)	Max.	Min.	
2021	03	01	60	35	0.00											
2021	03	02	54	34	0.00											
2021	03	03	61	30	0.00											
2021	03	04	59	34	0.01											
2021	03	05	51	37	0.10											
2021	03	06	53	38	0.08											
2021	03	07	50	34	0.07											
2021	03	08	53	31	T											
2021	03	09	54	41	0.02											
2021	03	10	58	41	0.00											
2021	03	11	60	33	0.00											
2021	03	12	62	31	0.00											
2021	03	13	64	30	0.00											
2021	03	14	51	41	0.16											
2021	03	15	47	28	0.00											
2021	03	16	54	27	0.00											
2021	03	17	62	31	0.00											
2021	03	18	54	37	0.14											
2021	03	19	55	46	0.04											
2021	03	20	53	42	0.14											
2021	03	21	50	42	0.17											
2021	03	22	54	38	0.17											
2021	03	23	58	32	0.00											
2021	03	24	50	42	0.13											
2021	03	25	56	40	0.01											
2021	03	26	57	44	0.00											
2021	03	27	64	38	0.00											
2021	03	28	52	39	0.14											
2021	03	29	54	32	0.05											
2021	03	30	54	28	0.00											
2021	03	31	70	30	0.00											
		Summary	56	36	1.43											

Empty, or blank, cells indicate that a data observation was not reported.

*Ground Cover: 1=Grass; 2=Fallow; 3=Bare Ground; 4-Brome grass; 5=Sod; 6=Straw mulch; 7=Grass muck; 8=Bare muck; 0=Unknown

"S" This data value failed one of NCDC's quality control tests.

"T" values in the Precipitation or Snow category above indicate a "trace" value was recorded.

"A" Values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.

Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.

Record of Climatological Observations

These data are quality controlled and may not be identical to the original observations.

Generated on 08/13/2021

National Centers for Environmental Information
151 Patton Avenue
Asheville, North Carolina 28801
Observation Time Temperature: Unknown Observation Time Precipitation: Unknown

Case 3:21-cv-05784 Document 1 Filed 10/21/21 Page 87 of 91

Year	Month	Day	Temperature (F)			Precipitation			Evaporation			8 in. Depth			Soil Temperature (F)		
			24 Hrs. Ending at Observation Time	At Obs.	24 Hour Amounts Ending at Observation Time	Rain, Melted Snow, Etc. (in)	Snow, Ice Pellets, Hail (in)	Fog	24 Hour Wind Movement (mi)	Amount of Evap. (in)	Ground Cover (see *)	Max.	Min.	Ground Cover (see *)	Max.	Min.	Min.
2021	04	01	67	46	0.00												
2021	04	02	64	34	0.00												
2021	04	03	70	39	0.00												
2021	04	04	59	42	0.00												
2021	04	05	61	32	0.00												
2021	04	06	64	33	0.00												
2021	04	07	52	41	T												
2021	04	08	56	41	0.01												
2021	04	09	60	31	0.00												
2021	04	10	53	40	0.08												
2021	04	11	60	28	0.00												
2021	04	12	65	30	0.00												
2021	04	13	66	32	0.00												
2021	04	14	70	37	0.00												
2021	04	15	75	39	0.00												
2021	04	16	79	40	0.00												
2021	04	17	83	41	0.00												
2021	04	18	83	42	0.00												
2021	04	19	73	43	0.00												
2021	04	20	74	39	0.00												
2021	04	21	77	41	0.00												
2021	04	22	66	41	0.00												
2021	04	23	62	47	0.00												
2021	04	24	55	48	0.17												
2021	04	25	60	48	0.02												
2021	04	26	59	47	T												
2021	04	27	67	40	0.00												
2021	04	28	73	42	0.00												
2021	04	29	79	45	0.00												
2021	04	30	70	48	0.05												
		Summary	67	40	0.33												

Empty, or blank, cells indicate that a data observation was not reported.

*Ground Cover: 1=Grass; 2=Fallow; 3=Bare Ground; 4=Brome grass; 5=Sod; 6=Straw mulch; 7=Grass mulch; 8=Bare mulch; 0=Unknown

"S" This data value failed one of NCDC's quality control tests.

"T" values in the Precipitation or Snow category above indicate a "trace" value was recorded.

"A" values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.

Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.

Record of Climatological Observations

These data are quality controlled and may not be identical to the original observations.

Generated on 08/13/2021

Observation Time Temperature: Unknown Observation Time Precipitation: Unknown

Case 3:21-cv-05784 Document 1 Filed 10/21/21 Page 88 of 91

Year	Month	Day	Temperature (F)		Precipitation			Evaporation			8 in. Depth			Soil Temperature (F)		
			24 Hrs. Ending at Observation Time	At Obs.	Rain, Melted Snow, Etc. (in)	Snow, Ice Pellets, Hail (in)	Fog	Snow, Ice Pellets, Hail, on Ground (in)	24 Hour Wind Movement (mi)	Amount of Evap. (in)	Ground Cover (see *)	Max.	Min.	Ground Cover (see *)	Max.	Min.
2021	05	01	62	51	0.00											
2021	05	02	67	50	0.00											
2021	05	03	64	49	0.08											
2021	05	04	69	52	0.00											
2021	05	05	82	43	0.00											
2021	05	06	67	50	0.01											
2021	05	07	61	43	0.02											
2021	05	08	61	38	0.00											
2021	05	09	66	52	T											
2021	05	10	71	48	0.00											
2021	05	11	75	47	0.00											
2021	05	12	79	48	0.00											
2021	05	13	77	51	0.00											
2021	05	14	80	55	0.00											
2021	05	15	80	48	0.00											
2021	05	16	82	49	0.00											
2021	05	17	67	49	T											
2021	05	18	62	48	0.22											
2021	05	19	61	40	T											
2021	05	20	62	41	0.02											
2021	05	21	67	45	0.00											
2021	05	22	63	49	0.00											
2021	05	23	65	50	T											
2021	05	24	62	51	0.33											
2021	05	25	61	54	0.22											
2021	05	26	72	46	0.00											
2021	05	27	65	52	0.14											
2021	05	28	69	52	0.00											
2021	05	29	82	46	0.00											
2021	05	30	83	51	0.00											
2021	05	31	88	56	0.00											
		Summary	70	49	1.04											

Empty, or blank, cells indicate that a data observation was not reported.

*Ground Cover: 1=Grass; 2=Fallow; 3=Bare Ground; 4-Brome grass; 5=Sod; 6=Straw mulch; 7=Grass muck; 8=Bare muck; 0=Unknown

"S" This data value failed one of NCDC's quality control tests.

"T" = Temperature at time of observation

"T" values in the Precipitation or Snow category above indicate a "trace" value was recorded.

"A" values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.

Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.

Record of Climatological Observations

These data are quality controlled and may not be identical to the original observations.

Generated on 08/13/2021

Year	Month	Day	Temperature (F)			Precipitation			Evaporation			8 in. Depth			Soil Temperature (F)		
			24 Hrs. Ending at Observation Time	At Obs.	Min.	24 Hour Amounts Ending at Observation Time	Rain, Melted Snow, Etc. (in)	Snow, Ice Pellets, Hail (in)	Fog	24 Hour Wind Movement (mi)	Amount of Evap. (in)	Ground Cover (see *)	Max.	Min.	Ground Cover (see *)	Max.	Min.
2021	06	01	95	59	0.00												
2021	06	02	90	62	0.00												
2021	06	03	82	57	0.00												
2021	06	04	78	53	0.00												
2021	06	05	69	49	T												
2021	06	06	62	48	0.03												
2021	06	07	67	49	0.00												
2021	06	08	67	49	0.01												
2021	06	09	70	49	0.00												
2021	06	10	68	53	0.00												
2021	06	11	64	56	0.08												
2021	06	12	79	58	0.27												
2021	06	13	68	61	0.70												
2021	06	14	71	58	0.35												
2021	06	15	71	52	0.03												
2021	06	16	79	49	0.00												
2021	06	17	84	51	0.00												
2021	06	18	80	57	0.00												
2021	06	19	82	55	0.00												
2021	06	20	91	59	0.00												
2021	06	21	95	62	0.00												
2021	06	22	84	62	0.00												
2021	06	23	82	58	0.00												
2021	06	24	88	56	0.00												
2021	06	25	93	63	0.00												
2021	06	26	108	67	0.00												
2021	06	27	112	69	0.00												
2021	06	28	115	69	0.00												
2021	06	29	92	64	0.00												
2021	06	30	77	63	0.00												
		Summary	82	57	1.47												

Empty, or blank, cells indicate that a data observation was not reported.

*Ground Cover: 1=Grass; 2=Fallow; 3=Bare Ground; 4=Brome grass; 5=Sod; 6=Straw mulch; 7=Grass muck; 8=Bare muck; 0=Unknown

"S" This data value failed one of NCDC's quality control tests.

"T" values in the Precipitation or Snow category above indicate a "trace" value was recorded.

"A" values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.

Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.

Record of Climatological Observations

These data are quality controlled and may not be identical to the original observations.

Generated on 08/13/2021

National Centers for Environmental Information
151 Patton Avenue
Asheville, North Carolina 28801
Observation Time Temperature: Unknown
Observation Time Precipitation: Unknown

Year	Month	Day	Temperature (F)			Precipitation			Evaporation			8 in. Depth			Soil Temperature (F)			
			24 Hrs. Ending at Observation Time	At Obs.	24 Hour Amounts Ending at Observation Time	Rain, Melted Snow, Etc. (in)	F - Snow, Ice Pellets, Hail (in)	F - Snow, Ice Pellets, Hail (in)	24 Hour Wind Movement (mi)	Amount of Evap. (in)	At Obs. Time	Snow, Ice Pellets, Hail, Ice on Ground (in)	Ground Cover (see *)	Max.	Min.	Ground Cover (see *)	Max.	Min.
2021	07	01	73	64	0.00													
2021	07	02	85	62	0.00													
2021	07	03	86	61	0.00													
2021	07	04	85	57	0.00													
2021	07	05	85	59	0.00													
2021	07	06	88	59	0.00													
2021	07	07	74	59	0.00													
2021	07	08	78	57	0.00													
2021	07	09	87	55	0.00													
2021	07	10	86	59	0.00													
2021	07	11	85	57	0.00													
2021	07	12	85	57	0.00													
2021	07	13	84	57	0.00													
2021	07	14	81	58	0.00													
2021	07	15	78	58	0.00													
2021	07	16	77	58	0.00													
2021	07	17	80	60	0.00													
2021	07	18	86	58	0.00													
2021	07	19	87	60	0.00													
2021	07	20	78	60	0.00													
2021	07	21	75	52	0.00													
2021	07	22	81	55	0.00													
2021	07	23	85	55	0.00													
2021	07	24	90	63	0.00													
2021	07	25	89	62	0.00													
2021	07	26	87	60	0.00													
2021	07	27	86	62	0.00													
2021	07	28	93	60	0.00													
2021	07	29	96	64	0.00													
2021	07	30	93	68	0.00													
2021	07	31	82	69	0.00													
		Summary	84	60	0.00													

Empty, or blank, cells indicate that a data observation was not reported.

*Ground Cover: 1=Grass; 2=Fallow; 3=Bare Ground; 4-Brome grass; 5=Sod; 6=Straw mulch; 7=Grass muck; 8=Bare muck; 0=Unknown

"S" This data value failed one of NCDC's quality control tests.

"T" values in the Precipitation or Snow category above indicate a "trace" value was recorded.

"A" Values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.

Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.
Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.

"At Obs." = Temperature at time of observation

"T" values in the Precipitation or Snow category above indicate a "trace" value was recorded.

"A" Values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.

Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.

Record of Climatological Observations

These data are quality controlled and may not be identical to the original observations.

Generated on 08/13/2021

Year	Month	Day	Temperature (F)			Precipitation			Evaporation			8 in. Depth			Soil Temperature (F)			
			24 Hrs. Ending at Observation Time	At Obs.	24 Hour Amounts Ending at Observation Time	Rain, Melted Snow, Etc. (in)	F - Snow, Ice Pellets, Hail (in)	F - Snow, Ice Pellets, Hail (in)	24 Hour Wind Movement (mi)	Amount of Evap. (in)	At Obs. Time	Snow, Ice Pellets, Hail, Ice on Ground (in)	Ground Cover (see *)	Max.	Min.	Ground Cover (see *)	Max.	Min.
2021	08	01	88	62	0.00	T												
2021	08	02	90	60														
2021	08	03	88	63	0.00													
2021	08	04	94	61	0.00													
2021	08	05	83	64	0.00													
2021	08	06	82	64	0.02													
2021	08	07	80	59	T													
2021	08	08	76	56	0.00													
2021	08	09																
2021	08	10																
2021	08	11																
2021	08	12																
2021	08	13																
2021	08	14																
2021	08	15																
2021	08	16																
2021	08	17																
2021	08	18																
2021	08	19																
2021	08	20																
2021	08	21																
2021	08	22																
2021	08	23																
2021	08	24																
2021	08	25																
2021	08	26																
2021	08	27																
2021	08	28																
2021	08	29																
2021	08	30																
2021	08	31																
		Summary	85		61					0.02								

Empty, or blank, cells indicate that a data observation was not reported.

*Ground Cover: 1=Grass; 2=Fallow; 3=Bare Ground; 4-Brome grass; 5=Sod; 6=Straw mulch; 7=Grass muck; 8=Bare muck; 0=Unknown

"S" This data value failed one of NCDC's quality control tests.

"T" = Temperature at time of observation

"T" values in the Precipitation or Snow category above indicate a "trace" value was recorded.

"A" Values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.

Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.